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ABSTRACT

The Draft Report of the Commission on Post-Secondary Education in Ontario has stimulated extensive debate within the universities of the province. The report was designed to provide a comprehensive overview of higher education in Ontario, and to provide recommendations for the improvement of higher education. This publication contains highlights of that debate from the standpoint of the Council of Ontario Universities and its committees and affiliate organizations. (HS)

RESPONSES

To the Draft Report of the Commission on Post Secondary Education in Ontario

ED 069210

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Council of Ontario Universities
Conseil des Universités de l'Ontario

Responses

to the Draft Report of the Commission on Post-Secondary Education in Ontario

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PREFACE

The Draft Report of the Commission on Post-Secondary Education in Ontario has stimulated extensive debate within the universities of the province. This publication contains highlights of that debate from the standpoint of the Council of Ontario Universities and its committees and affiliate organizations.

The Response of the Council itself is printed here in full. This statement is followed by selected excerpts from the comments of some of the COU committees and affiliates.

May 1972.

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COUNCIL OF ONTARIO UNIVERSITIES
CONSEIL DES UNIVERSITÉS DE L'ONTARIO

The Council of Ontario Universities through its affiliates and committees has undertaken a thorough and comprehensive review of the Draft Report. Selected excerpts from their critiques are being published along with this brief, and will be made available to the Commission. COU has used the briefs of its affiliates, as well as a large number of other commentaries from universities and individuals, in its own deliberations on the Draft Report. We have been impressed by the high degree of consistency in the views expressed. In general, the university community appears to be sympathetic to a number of the ideas advanced in the opening sections of the Draft Report, for example those reflecting concern for improved accessibility and diversity, but finds the recommendations in many instances to be incompatible and inconsistent with the declared objectives of the Report. The wording of a number of the recommendations is ambiguous, and sometimes contradictory.

COU decided that in its own response it would deliberately be selective, concentrating on the three issues which it thinks are most important, namely:

(a) educational philosophy (including consideration of questions of quality, the distinctive role of the university, accessibility, diversity);
(b) provincial structures;
(c) financing (including the proposal to separate the support of teaching and research, and the proposals concerning student aid).

Our decision to deal selectively with these fundamental questions should not be interpreted as tacit support for all other aspects of the Report, for in general COU agrees with the overall thrust of the criticisms expressed in briefs from the university community. Neither should our decision be interpreted as lack of concern for those aspects of the Draft Report which deal with the non-university sectors of post-secondary education. We support strengthening and expanding the alternatives to university education. Put simply, our decision to concentrate on three issues reflects our hope that we can convince the members of the Commission that the future health and welfare of the universities in Ontario (and hence of Ontario society itself) demand basic alterations in the substance of the Commission's position. We propose alternatives in our brief which we believe are sound, evolutionary, and consistent with the principles supported by the Commission.

"Aims and Objectives"

Accessibility to what?

The Commission enunciates six principles which guided its critique of the Ontario post-secondary educational system and its recommendations for reform: universal accessibility, openness, diversity, flexibility, transferability, and public accountability. The themes of accessibility/openness and accountability seem to have had the most impact on the formulation of recommendations. The Commission identifies some rigidities in the educational system which it thinks should be broken down in order to make educational experiences more readily available to more types of people, and to allow the system to be increasingly shaped by and responsive to the needs of society. These needs are defined primarily in consumer terms: there is a strong emphasis on the individual deciding what is best for him. To attract the consumer, there is a heavy stress on packaging the offerings in attractive ways.

The Commission warns against overblown and unrealistic expectations of the value of education as a vehicle for social development and as a panacea for social ills. Despite its own statements, however, the Commission appears to have fallen into the same trap. The Report is characterized by an uncritical faith in the value of more and more education for more and more people. The Report gives this impression because of the striking absence of any significant discussion about the nature of the educational experience which is to be proliferated. Meaningful discussion of accessibility must include consideration of what is accessible. The Report has a mass consumer orientation but fails to examine the quality of the product. We are deeply disturbed by the absence of serious attention to the purposes, nature, and quality of the educational experiences which are to be made more widely available.

"The quality of an educational process is often very difficult to measure, and for this reason, among others, may tend to be dismissed as largely irrelevant—as a 'shibboleth of academic standards'—by the trendier members of a measurement-happy society. But what is difficult of

measurement may nevertheless be a lot more 'real' and relevant than many things which can be more easily converted into statistics. Most people with much experience of post-secondary education, whether as students or as students then teachers, recognize educational quality as a reality. They may disagree as to how to identify and characterize it, but they know that between a first-class and a third-class learning experience there is a great gulf fixed."[1]

Perhaps it is not surprising that the matter of quality receives little attention. Preoccupation with egalitarian principles can easily obscure the need for comparable attention to quality. Elitism is associated in the minds of many with privilege—based on social class or money. For very good reasons we want to reject that kind of elitism in our society and the Commission has recognized that we should. What is disturbing is that in rejecting privilege (i.e. "elitism" as described in the Draft Report) the Commission also seems not to recognize that people are different and that some people are qualified to profit from one kind of educational experience and some are qualified for another. In contemporary society, recognition of excellence (which can be achieved in any field of human endeavour) is too often confused with status ranking and snobbism.

The question has been put whether the primary objective of post-secondary education is to increase the general educational level of the population or to provide manpower training in accordance with the demands of the labour market. This is a false dichotomy. The emphasis on either of these functions will vary for different individuals, courses, and programmes of study. What is important to remember with respect to both functions is that higher education prepares citizens to assume important roles of service in our society. Any tendency to discourage a quest for excellence could result in a diminished capacity for leadership within Canada, with a consequent excessive dependence upon highly qualified people from external sources.

The Report advocates "universal" accessibility, while not actually using the term "open admissions." In places such as Recommendations 7 and 22, the desire to study seems to be transformed into the right to do so. Admission standards are to become the ghosts of an elitist past. Only with respect to medicine and dentistry (Recommendation 30) is there any reference to "qualified applicants whose attitudes and attainments indicate a reasonable probability of success." Are these the only areas where the capacity for success should be a reasonable criterion for admission? We hope the Commission will clarify its views on this matter.

Guaranteeing the right of every person to try his hand at anything he fancies is attractive, but we question whether it is possible to equate what may seem to be desirable for the individual with what is socially desirable. We believe a policy of unlimited right to try anything will increase rather than diminish the level of social frustration by holding out unrealistic expectations.

We do not accept the argument (on page 19) that democracy requires that every institution enjoying heavy subsidy from the public purse be freely accessible to everyone. Surely it is not unreasonable for society to subsidize social institutions which will serve particular specialized purposes, if it is to the larger benefit to have such institutions. (Should every citizen have free access to the expensive and specialized facilities of the National Film Board or the CBC for film production just because they are publicly supported?) If resources are scarce, and they always are, the benefits of open accessibility must be measured against the costs, so that available resources can be used as effectively as possible.

Our position is simply this: The government has a responsibility to determine how many students it can afford to pay for. (We hope this will include all those qualified.) The universities, for their part, must be responsible for judging who among those seeking admission can profit by the experience.

The special role of the university

In its efforts to eliminate academic snobbism (which we agree is a worthy aim), the Commission has ignored real and important distinctions by concentrating on the arbitrary and status-conscious abuses of those distinctions. As a result, the Report conveys a decided attitude of hostility to intellectual quality, and develops recommendations whose general combined thrust is in the direction of increasing homogenization of post-secondary education, contrary to the Commission's avowed intention of encouraging diversity. The Commission is eager to eliminate the traditional boundaries and standards of universities, without suggesting new boundaries and standards to replace them. The various post-secondary institutions are not to be in any basic ways different from each other, in values, educational goals or operational principles.

The distinguishing characteristic of a university is its simultaneous commitment to two functions: the transmission to students of a spirit of critical inquiry and of the knowledge on which any valid inquiry must be based; the development of new knowledge and insights.

This is not to say that other institutions do not also introduce their students to the spirit of challenge and inquiry even while the main emphasis may be on the transmission of expertise and skill. Nor do we suggest that fundamental research should not take place in non-university educational institutions. The distinction is one of degree: a university must see its ethos in teaching in-

[1] D. L. McQueen, "Memorandum to York University Senate Academic Policy and Planning Committee," March 1, 1972, p. 2.

formed by the search for new understanding. Universities engage in a variety of additional activities which, while not integral to this central concept, are consistent with it. The expertise of the university and its staff is often turned to specific problems of society or industry. The universities offer a good many degree programmes with a high "knowledge transmission" content and definite vocational goals.

Institutions designed to foster excellence each have their own distinctive roles arising out of their particular commitments. In the case of the university, that commitment is to the highest levels of intellectual performance. University study tends to emphasize abstract thought; it constantly seeks and examines principles; it asks "why" much more often than "how." This kind of study does not suit everyone; it does not correspond to the mental inclinations (or capacities) of many. For those people whose interests are limited to learning concrete things and developing special skills there are other post-secondary institutions, and these should offer educational opportunities that are of the highest quality of their kind.

The Report makes no mention of the historical distinctiveness of the university as a social institution. In meeting its true obligations to society, the university has been given a high degree of independence, not for the sake of the vested interests of ivory-towered academics, but so that it can perform properly its social role as the generator of new knowledge and as the sceptic of established belief and practice. The university, if it is to serve society well, plays the role of critic, or put more properly, provides a home for informed critics. There must be accountability, but this accountability should take its own special form for the same reasons that a democratic society protects the freedom of the press and the independence of the judiciary. Universities are thus justifiably wary when they hear cries of "more accountability," "more efficient delivery of services," and "less emphasis on useless research." Universities have always had a heavy involvement in research—or, to put it more broadly, in scholarship—in relation to this innovative and critical function. If they are turned into efficient supermarkets of canned, boxed, and otherwise packaged instruction with something for everybody, society is the loser. The thrust of the Report is very much in this direction—the assimilation of the universities into the mass consumer society and its value system. "Nationalization" is a term which comes to mind, although "provincialization" might be more appropriate.

How much diversity does the Commission encourage?

The vast scope of activities now found in universities offers much room for diversity of approach—in radically different programme arrangements, in different techniques of instruction, and in differing institutional emphases. There is merit in having the small institution with a strong community feeling and the large internationally known "multiversity." There is advantage in having universities which stress the social sciences, and others which stress the sciences or humanities. There is advantage in the existence of freely structured patterns of study alongside traditional programmes of proven merit.

Although the Commission favours diversity, we find little in the recommendations which would encourage it. In fact, we find potential discouragement. For example, while recommending "opportunities appropriate to the individual student," the Draft Report says "fixed and rigid curricula should be abandoned in favour of a flexible approach." A truly diverse system will have room for both flexible curricula and for carefully structured programmes of study. Similarly, in Recommendation 23, the Commission proposes legislating the availability of *all* programmes to part-time students, even though other alternatives are sometimes preferable.

We welcome the wish for increased diversification of our system indicated by the suggested establishment of satellite campuses, small colleges and the University of Ontario (Recommendations 15, 16, 19, 20, 21). We are concerned, however, about the practicality of some of these developments and we discuss this below. In a period of declining enrolments, such new developments should take particular care not to weaken existing institutions, particularly the smaller, newer ones. We agree nonetheless that some careful experimentation in this area would be justified.

The Coordinating Board of Recommendation 52 has responsibility for the establishment of new programmes and the discontinuance of "unnecessary" programmes at both graduate and undergraduate levels. In theory, such a centralized bureaucracy *could* make decisions that would preserve diversity, but there is little reason to expect such a departure from previous experience with centralized control. One may recall the monolithic structure produced in the universities of France by detailed control from Paris; the deeply troubled French university system is now being decentralized.

We find several areas of the Report to be lacking in recognition of these important considerations. First, the development of distinctive types of excellence is not likely to be furthered by the dilution of admissions standards. Second, the setting of general admissions policies by the proposed coordinating board would be antithetical to the development of diverse types of excellence among institutions within each sector. Third, the similarity among the functions of the coordinating boards for the different sectors would be antithetical to diversity among types of institution, as would the bureaucracy which would necessarily be built to support those functions. Fourth, the implicit

shift to considerably higher teaching loads in the universities (analysis supporting Recommendation 61) would be contrary to the maintenance of teaching excellence in the universities.

Should we eliminate the use of degrees as credentials?

The Commission notes the arbitrariness of educational credentials, and the abuse of such credentials by business and the professions for certification functions. Such abuses can of course debase the quality of the educational experience, but we do not believe that the alternatives proposed by the Commission would result in an improved situation. The cure may be worse than the disease. The Commission's views in this area are surprising, given its heavy emphasis on the value of experience. Is it reasonable to recognize the value of experience in every field of human endeavour except education?

The Commission objects to any use of the educational system for the purpose of social sorting. The identification and development of talent in order to fill appropriately various social roles is an indispensable function in any society, one which the educational system performs remarkably well. Of course, the system can be used in an unduly rigid and exclusive way, but one must not confuse legitimate uses with abuses. What other social mechanisms are available to perform this function better? The Commission gives us one anachronistic answer—examinations.

The Commission proposes the use of entrance examinations and experience as the sole basis for entrance into the professions or business careers. In recent years the trend has been toward decreasing emphasis on formal examinations as adequate measures of a person's capacity or accomplishments. Increasing reliance has been placed on a variety of measures, formal and informal, applied over an extended period, in a process more closely approximating continuous monitoring than the old model of the final examination. Correlatively, business and the professions have increasingly recognized the necessity to recruit adaptable individuals with a sound foundation of general education and the trained capacity to analyze and solve problems in a rapidly changing environment.

The Commission seems to discount these generally positive changes in social and educational attitudes. To take a noteworthy example, medical education has improved markedly in recent years as the control of licensing bodies over the educational process has diminished. Any move to reverse such trends would increase the monopolistic powers of the professions, in direct contradiction to the Commission's own aims. Placing upon employers or professional licensing bodies an increased responsibility for certifying entrants would assert increasing external control of the curricula of higher education, in a stronger fashion than the effect of the old grade 13 examinations on the freedom of the high schools. There is no way that one can legislate against such effects. We suggest that the Commission reconsider its evaluations and recommendations in this area of the Report.

We suggest that Recommendation 31 be deleted in its entirety. The first part of the recommendation, which attempts to separate admission to professional practice from educational experience, is ill-advised for the reasons given above. The proposals on periodic re-evaluation are simplistic, and in their present form dangerous. Setting entry qualifications at the level of requalification requirements could lead to continuous regression in professional knowledge and competence. While there is much merit in the concept of requalification, the subject requires a great deal of further careful study before implementation.

The legislative powers proposed in Recommendation 33, to prevent discrimination on the basis of educational attendance, are too sweeping as presently phrased. Rigid employment categories are clearly undesirable, but the first part of the recommendation reads as if education is not even to be considered relevant. Using relevant criteria to make wise choices is not "discrimination."

We do not wish to imply that we are opposed to all formal entrance examinations. Any profession has the responsibility (with due recognition of the public interest) to ensure the qualifications of its entrants. Universities have a similar interest in the suitability of their entrants for advanced study, and the implementation of this responsibility may involve some form of examination, but the form and method of use of any such examination should be as flexible as possible, so that the risk of excluding qualified applicants is minimized, and so that deleterious effects on the educational process which precedes entry are also minimized.

Degrees are referred to as paper credentials (page 20); they are to be downgraded and proliferated so that they will become valueless in the eyes of the public. The question arises: is it *socially* desirable to spread out opportunities for young and old to earn degrees and at the same time cynically to debase their value? Implicit in the Report is a disapproval of higher education being used as an avenue for social mobility; this philosophy underlies the attack on credentialism. Is it really undesirable for education to serve as a vehicle of social mobility; if so, what alternative avenues for social mobility can serve as well or better? Here we are dealing with social attitudes. How are these to be changed? The fact is that people will continue to see education as a means for social as well as personal achievement and advancement; it is a cruel joke to make the certificates of that accomplishment increasingly worthless.

Alternative patterns of study are desirable

The Commission expresses strong views on the lockstep educational system. We fully support increased accessibility to higher education for all age groups, both on a full-time and part-time basis. We do not agree that sequential is bad and that part-time is necessarily preferable to full-time study. The Commission appears to discount the value of immersion in an educational environment over a period of time. Education can be seen as a personal good and a lifelong process; it can also be seen as preparation for the business of life, often with definite vocational aims. The two forms are not mutually exclusive even in one individual. Moreover, both forms of education are pursued on both a full-time and a part-time basis, and indeed on a "sandwich" basis in which periods of full-time study alternate with periods of employment. All these approaches have their places in the educational system. Each suits the circumstances and wishes of some people, and each is appropriate to a greater or lesser degree for some fields of study.

Where the training is lengthy and expensive, as in the more demanding professions, it is in the interests of society that it make efficient use of material and human resources. This usually implies uninterrupted full-time study. Full-time study is also desirable where continuous exposure to an intellectually challenging environment is necessary and where the work is particularly demanding. Perhaps the most obvious illustrative example is that of the student who is attempting to write a doctoral thesis while engaged in full-time employment. Even when the employment allows free summers, the result is usually a great deal of frustration and years of delayed achievement —a poor return for the investment already made in the student's doctoral education.

We do not denigrate the value of maturity in a student. Often a person returns to university study with greater motivation and some wisdom after a break of some years from academic pursuits. It is also true that this is by no means the universal experience. We believe it should be a matter of personal choice as to whether or not one's education is "sequential."

Contrary to the view often held by those who have not tried it, part-time study is a particularly difficult way to obtain a degree. If it is worthwhile, a university course is not simply a diversion which one can readily enjoy after a full day's work. The experiences of any of the well developed part-time BA programmes in Ontario bear this out, as do the early experiences of the Open University in Britain. We therefore urge that, while part-time and "adult" education should be more fully developed, it would be a great mistake to reduce the attention paid to the full-time mode.

Structure

Ontario universities share the heritage of freedom of thought and inquiry that the free world has cherished. The advent of state financing has made it necessary, here and elsewhere, to define the essential conditions of continued freedom. A well-known Canadian definition was formulated in 1964:

> I would suggest that there are three basic freedoms: the freedom to determine who shall be taught, the freedom to determine what shall be taught, and the freedom to determine who shall teach. I shall add a fourth, although it is implied in the first three: the freedom to distribute its financial resources as it sees fit. I am not suggesting that these are absolute freedoms, in the sense that the universities should refuse to discuss any of these matters with outside bodies. I am simply saying that the university must never abdicate its right to make the final decisions in any of these areas. For abdication in one means abdication in all.[2]

More recently, Professor Robert Berdahl has written:

> These authorities [Eric Ashby, Lord Robbins, Hector Hetherington, James Mountford and the University Grants Committee] agree that any self-respecting university, no matter how willing it is to be responsive to systematic planning based on the public interest, must retain control in the following areas: a) the appointment, promotion, and tenure of academic and administrative staff; b) selection of students; c) curriculum content and degree standards; d) the balance between teaching and research (and, in the United States, one would add public service); and e) allocation of income among different categories of expenditure.[3]

All these freedoms are lost if the Commission's recommendations are implemented as they stand. "In essence, this set of recommendations asserts that it is . . . the right of a province-wide body to decide where and when new programs (graduate as well as undergraduate) should be established and/or abolished, and what kind of admission standards should prevail . . ." (p. 35). When we have a government-appointed central body empowered to abolish courses—to say what may or may not be taught—the essential freedom of the university will have been lost. It should be noted also that guidance, testing and evaluation, and a vast array of examinations would be centralized as well under the Commission's scheme.

The Commission invokes a principle with which we have no quarrel: massive support from the public treasury requires strict public accountability. But the Commission does not demonstrate that this principle requires the use of the machinery recommended. The Commission does not analyse the actual workings of the present system of external university financing and internal distribution in order to demonstrate defects remediable only by the recommended machinery.

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[2] C. T. Bissell, *The Strength of the University*. (Toronto: University of Toronto Press, 1964), p. 236.

[3] R. O. Berdahl, *Statewide Coordination of Higher Education*. (Washington: American Council on Education, 1971), p. 254.

The Board's constitution superficially might appear to be eminently democratic and non-governmental. However each of the twelve members will effectively be appointed by the Minister of Colleges and Universities. Secondly, the Board's composition would be splintered into small representations from various public and internal "estates" and, except for a small minority, the representatives would have had no relevant experience in university academic affairs. Thus, a real danger exists that the Board's power over the universities' academic life would be exercised by its permanent staff headed by its government-appointed full-time chairman. This danger is surely intensified by the proposal in the Draft Report "that in both cases (relating to the universities as well as the colleges) there will be need for transfers of staff from the presently constituted governmental departments to the coordinating boards" (p. 36). The fact is that under the facade of a disinterested public tribunal, the Government of Ontario would be in a position to exercise complete control of all aspects of the academic programmes of universities in this province.

In suggesting that the staff for the Coordinating Board would be drawn from the Department of Colleges and Universities, the Commission may not appreciate how large a staff would be required if it were to meet its specified responsibility for determining when and where to establish or discontinue programmes, both graduate and undergraduate. Either the task would be approached on an almost entirely arbitrary basis or it would involve a vast bureaucracy probing the details of staff (numbers and qualifications), library, physical plant, student demand, manpower needs, and cultural and economic trends. COU through its Advisory Committee on Academic Planning is involved currently in studying the needs in 15 graduate disciplines. To perform the task well it has found it necessary to involve some 200 faculty members in design of the studies and assembly of data in the universities as well as some 60 independent consultants to provide advice. This cooperation has been mounted by the universities to accomplish a task which must be done. It represents the price of genuine planning. It is depressing to think of this responsibility being shifted to a government appointed Board, external to the universities, being served by a large civil service staff far removed geographically, academically and spiritually from the realities of each university and each community.

Alternative proposals

The members of the Commission have asked for alternative proposals when serious objections are raised against the recommendations in the Draft Report. We approach this task in the spirit encouraged by the Commission: "We have rejected this assumption [that only revolutionary change is likely to bring about improvement] and built on the supposition that we can correct whatever abuses there may be through an evolutionary process of change." Coupled with the Commission's own observation that "Ontario has been well served by its post-secondary educational system," a case can be made for examining the present structures and proposing reforms in them in order to accomplish the Commission's objective: "to reconcile the public interest with the appropriate degree of institutional autonomy that will permit the diversified, flexible and open system which we desire." In short, how can the present operation of CUA and COU be strengthened?

Our approach is to identify those matters which must be responsibilities of government and those which more properly should be the responsibility of the universities, either individually, or collectively through COU.

A weakness of CUA identified by the Commissioners is that its terms of reference are too broad, and that accordingly it has the potential of being either too powerful or too weak. We share this view and believe a redefinition of its terms of reference would be helpful. Moreover with new responsibilities as proposed below, the composition of CUA will need to be reconsidered to ensure that it commands the respect of the public and the universities. Obviously, adequate academic representation will be essential. We believe also that the way in which its members are selected can be improved by a more deliberate invitation to groups and individuals to propose nominations to the Minister. We believe the government was wise in establishing CUA as an essentially advisory committee and we believe its advisory function could gain desirable independence if it had its own secretariat, not drawn from the staff of the Department of Colleges and Universities. Indeed, we have repeatedly drawn attention to the desirability of such a change.

Government must decide how much money it will provide and in general what it is prepared to pay for. It must play an appropriate part in major policy decisions; and it must have a means of assuring that the universities are serving their proper purposes effectively and economically. The problems in meeting these responsibilities have changed in recent years. The sixties were characterized by rapid and unprecedented growth, some significant steering effects of the formula, and rapid growth in operating incomes. The early seventies have seen important changes. Growth has slowed down, most notably at the graduate level. The change in growth rates is partly attributable to social and economic phenomena but in addition the government has introduced several measures designed to inhibit enrolment growth. These have been directed particularly at the graduate schools but newly announced increases in fees and changes in OSAP policies will tend to dampen undergraduate growth also. It seems clear that the real problem faced by government is its concern about

the steering effects of the present formula and a growth rate for Ph.D. students which exceeds in total the numbers which the government is prepared to pay for.

Whether the problems continue to be manifested in the same way over the next decade would be hard to predict. What is certain however is that whatever the changes, the government will be concerned with the total numbers of students to be supported by the system and the amount of support to be provided. It is possible, indeed probable, that these concerns will at different times involve different policies in relation to total numbers of graduate students, total professional students, and total undergraduate students.

The role of CUA

Accordingly, we suggest revision in the terms of reference for CUA, and the establishment of new responsibilities for COU. The terms which we suggest for CUA are as follows:

Subject to consultation with COU and the universities,

1. To advise the Minister on the total number of graduate and professional students (and, if necessary, undergraduate students) to be supported by provincial grants.
2. To advise the Minister on the levels of financial support, both operating and capital, which are required for the proper functioning of the universities.
3. To have authority to review the formulae for operating grants and capital grants and to amend these as necessary with reasonable advance notice to the universities.
4. To advise the Minister concerning proposals for the establishment of major new units (universities, faculties or schools) and programmes for which extra-formula support may be required.
5. To consult with and receive reports from the Council of Ontario Universities concerning matters related to the planning and coordination of the university system in Ontario.
6. To report annually to the Minister on the functioning of the university system in Ontario.

These functions would settle the question of numbers and would eliminate cause for concern over programme proliferation. They would ensure that government has assistance in determining levels of support and that through the use of formulae would determine, in general, what it is prepared to pay for. They also provide a basis for advice on major developments and new areas which would not be covered by formulae. Finally, they establish a trusteeship function, a responsibility to review the overall operation of the system and to report to the Minister. Since this body would be drawn from the community at large (including some members from the universities), it would provide a focus for accountability of the system. Accountability of individual universities is provided through their governing boards which also draw membership from the community at large. In this latter regard we believe that within the framework of the terms we propose for CUA and COU, that CUA should be primarily concerned with the *system* and not with the individual universities. CUA would perform a trustee function in regard to the system, evaluating the performance of COU, while the individual Boards would be trustees for individual universities. This arrangement would make universities accountable both individually and collectively without assuming that all power must be transferred to a government appointed Coordinating Board external to the universities. The Commission's proposed solution substitutes external authority for internal accountability. Moreover, since the Commission hopes for rapid and sensitive response to students' needs it would be wise to avoid centralization as an approach to this objective. Individual universities, not a central bureaucracy, have the best opportunity for response to a "grass roots" movement.

The position of COU

Members of the Commission have criticized COU on grounds that they question the capacity of a voluntary organization drawn from the fourteen universities to make hard decisions serving the overall interests of the province's university system when such decisions may restrain the aspirations of individual universities. We acknowledge that COU has had its difficulties. The habits of cooperation have had to be learned and the process has sometimes been slow. It is true that COU and the Senates took some time to agree on machinery for planning the graduate enterprise on a province-wide basis. (It is worth noting that a cooperative system of graduate planning represented a major departure from the traditional independence enjoyed by some Ontario universities for one hundred years or more. The fact that it was accepted in only three years from the time proposals were introduced represents a remarkable accomplishment.) A plan for cooperative collecting for graduate libraries has remained elusive in spite of genuine efforts to develop one.

On the other hand COU has been responsible for a highly successful system of appraisal of graduate programmes to ensure quality in graduate education; COU is now engaged in systematic planning of graduate development in the province, a process which is bound to result in the imposition of constraints on individual universities; COU accepted a series of constraining recommendations in its report on engineering education and these include

drastic reductions in Ph.D. enrolment; COU has committed resources to the development of a national bibliographic service, the operation of an inter-library loan service, the design of a system-wide computer network and the establishment of an Application Centre to serve all students, all universities and the government.

A case can be made that COU does not have sufficient authority to ensure that system-wide concerns can always be adequately dealt with. Dr. Wright has stated that "multilateral decision-making does not reveal . . . attractive results *except* under duress. Alex Corry convened all the university department heads to make the case for voluntary coordination years ago. Nothing much happened until the University Affairs Committee dropped the embargo. I can only conclude that some external influence is required for excellence."[4] Dr. Wright's observation acknowledges that COU *can* be effective given the right circumstances and it is true that external pressure has been important to some of COU's accomplishments. We believe conditions other than "duress" can be created to allow both COU and CUA to meet the needs of both government and the universities.

Our suggested responsibilities for COU acknowledge the need for coordination and efficiency and the need to ensure that provincial policies are respected, but argue that these duties are best imposed on the universities collectively, rather than on an outside body. The university community has the resources to perform the necessary and complex functions. It has a tradition of cooperation and the duties are a natural extension of the responsibilities of individual universities. New responsibilities might need to be accompanied by a re-examination of the adequacy of the structure and composition of the Council. Responsibilities such as the following might be recognized for COU: The present objects of COU should continue, i.e., to promote cooperation among the provincially assisted universities of Ontario, and between them and the government of the province, and generally to work for the improvement of higher education for the people of Ontario. COU has already accepted the responsibility for developing orderly plans for graduate studies in Ontario universities, and this should continue. In addition, COU should keep under review the overall needs of the Ontario university system and make recommendations to CUA and the government in all of the areas where the final determination remains the responsibility of government.

The functions of coordination and of planning require that the universities have the power to implement group decisions. At the moment this power does not exist because COU is a purely voluntary organization. The members of COU recognize however that power to implement certain decisions related to the system as a whole must exist and that it can reside in only one of two places. It can reside in a body external to the universities (the Commission's proposal) or it can reside in the "collective autonomy" of the universities, namely COU. If our proposals are accepted, COU is committed to an immediate careful examination of the specific powers of implementation which it would have to have delegated to it and the structural changes in its own organization necessary to accomplish the required objectives. On the basis of this examination it will seek support from the Senates and Boards of the fourteen universities for a set of proposals involving delegation to COU of the specific essential powers necessary for rational and coordinated operation of the system.

It will be recognized that this commitment represents a major step. The members of COU are acknowledging the necessity of some limited degree of central authority in the university community and are prepared to work with their colleagues on the Senates and Boards to see that this requirement becomes generally recognized and that the necessary organizational steps which follow are taken.

The universities

Finally it is worth reaffirming once again the essential freedoms of the individual university—who shall teach, who shall be taught, what shall be taught, and how shall resources be allocated. These must be preserved to the maximum extent possible consistent with the government's responsibilities to decide on financial resources and to participate in broad decisions of public policy. To this end, and we believe consistent with and complementary to our proposals for the framework of the system as a whole, each individual university should continue to provide and maintain those programmes for which funds are received from government. It should be free to provide and maintain its own standards for admission and graduation of students, for administration of its own curricular affairs and for the employment of faculty and staff, and each university should set its own budgets and control its own expenditures. The constraints on total resources and the planning mechanisms under COU will ensure that these prerogatives will be exercised responsibly in the interests of the people of Ontario.

Regional coordination

We recognize that the needs of the various regions of Ontario are not identical and that additional needs will exist for regional coordination, not only among universities but between universities and other post-secondary institutions. We suggest that for these purposes regional coordinating

[4] Letter from Dr. D. T. Wright, March 10, 1972.

committees be established by the institutions themselves according to patterns deemed suitable in the light of the special requirements of each region.

Proposal for the University of Ontario

One other aspect of the Commission's proposed structure requires comment. Although we have grave reservations about the whole jurisdiction and powers of all the Coordinating Boards, we are limiting our observations here to the proposal that the University of Ontario be in the "Open Sector." This seems to us unwise. If the university is established, it will, if it is to thrive, need close ties and cooperation with other universities in the province.

Financing of Institutions and Students

Analysis of costs and benefits is required

The Draft Report offers no financial analysis of its proposals. A complete package is presented but there is no estimate of the cost. There is a need for costing of various components, with a priority list based on the assumption that funds will be limited. For example, we could all support the principle of equal funding of alternatives to conventional post-secondary education. We would not necessarily support implementation of such a policy if the costs exceeded the benefits more than for some other arrangement. We would particularly not like to see such recommendations implemented in haste as a political response to a perceived immediate social demand which might change direction in a few short years. Government's present preoccupation with financial constraints means that funds for new programmes will likely be drawn from traditional programmes. In the process, the quality of university education is bound to suffer. Surely such proposed major shifts in policy demand at least preliminary economic analysis of possible costs and benefits of various elements of the package to the individuals affected and to our society.

The financial proposals of the Commission are based on the assumption that unit costs, after allowing for inflation, can be kept constant for the next decade. We question this assumption. We foresee moderation of cost increases in the future. The average increase in the value of the basic unit for the period 1971-73 is less than the increase in the cost of living and considerably lower than general levels of salary increase. Total costs have also begun to moderate in the last couple of years. According to the Commission's tabulations, in the past decade unit costs have doubled in the university sector and more than tripled in the CAATs. An abrupt discontinuity at the present time with a shift to constant unit costs appears unlikely. This is particularly the case if all of the proposals to establish new campuses, open the accessibility gates, etc., are implemented. The likelihood of cost increases resulting from its proposals is a problem the Report does not face; instead, it suggests by inference, with little evidence, that unit costs will remain at constant levels.

We take exception also to the general thrust of the comments on page 39 that the universities have not been conscious of costs. Costs must be interpreted in relation to benefits. During the expansion of the sixties it was explicit government policy to provide accessibility to a greater proportion of the population, introduce quantum changes in graduate education, open new universities, and upgrade the quality of university resources. We have accomplished these goals and are grateful to the Ontario Government for its support. Other jurisdictions in Canada and elsewhere point with envy to what has been achieved. We were not unmindful of costs; the aforementioned benefits were seen by universities, government and the public as being worth the cost.

Purposes of proposed changes are questioned

Another deficiency of the Report is the lack of adequate explanation of the purposes of certain recommendations. What is the *true* purpose for proposing that funding of fundamental research should be separated completely from funding of instruction? To our knowledge not one of the universities has ever suggested that this separation in the manner proposed by the Commission would represent a desirable change in the existing operating grants formula. A statement such as the one on page 41 of the Report worries us greatly: "Both on educational and administrative grounds, the Commission became convinced that, rather than engage in a detailed analysis of each case, it would be desirable to change the way we finance research in educational institutions." This hardly seems sufficient explanation for recommending such a sweeping change.

Why should student fees be half of instruction costs rather than, for example, 20% of total costs? Here the explanation is that: "Following a series of 'test runs' of various schemes and extensive discussions, the Commission has decided to recommend that the public subsidy to institutions should amount to 50% of the operating costs for instruction." This is not a convincing justification for a recommendation which proposes to shift $60 to $70 million of costs to the student.

Economists have for years been wrestling with analysis of the returns to society and to the individual and with the

redistributive effects of higher education. All the analyses suffer from difficulties in estimating social return. Even those analysts who have attempted to take full account of social and private return have depended on historical data and many shaky assumptions.[5]

On the cost side, students might well point to foregone earnings as one of their costs; they would then be bearing substantially more than 50% of the total cost of instruction.

Problems with the separation of funding for research and instruction

The proposal for separating the funding of research and instruction (Recommendation 61) has caused a good deal of confusion and worry in the academic community. Northrop Frye has encapsulated the alarm at this suggestion: "... I have never found, in more than 30 years of teaching and writing that I could separate the two activities [research and teaching] ... it would reduce all university teaching to the level of an eighteenth century dame school."[6] A detailed commentary on this recommendation prepared by the Committee on Operating Grants is available in a supplementary report.[7] We summarize below the main deficiences of the proposal.

The Commission quotes Joseph Ben-David out of context as the justification for separating funding of fundamental research and instruction.[8] Ben-David's proposal must be interpreted in the context of the European university where return on investment in university research is poor; funds are controlled by chairs and institutes attached to chairs for a generation. Moreover, Ben-David's recommendations are designed to be applied to a national policy and would be inappropriate for a single province in Canada.

It is unrealistic to hold out the hope that "... the funding of research will not be immediately affected. ..." It is bound to be affected because the Commission is recommending the creation of many alternative competing institutions and structures which inevitably will find their sources of funds in existing programmes. The likely effect of this proposal therefore would be a substantial reduction in university funds.

Much university research is inseparable from university teaching. In cost accounting, products of inseparable processes are referred to as joint products. In this sense teaching and a large portion of university research are so interdependent that they can only be separated conceptually. Separation of costs of the two processes could only be accomplished by arbitrary divisions.

It is perfectly true that commitments to basic and applied research are unevenly distributed. Large established universities engage in much more such research proportionately than do smaller, newer institutions. More sponsored research is performed in the sciences than in the social sciences and humanities. Only a fraction of all faculty (probably not more than one-third) are engaged in sponsored research. It is equally true that the amount of time and effort devoted to other university activities, especially undergraduate teaching, varies widely. Faculty members in arts may spend more time at undergraduate teaching, scholarly study and administration than do faculty members in science.[9] It does not seem unreasonable to encourage differences in emphasis not only among individual faculty members but also among disciplines and among universities. At the same time the use of an overall yardstick in the form of an *average* student/staff ratio provides a reasonable basis for allocating operating income equitably. If one university chooses to use its faculty more for research and another more for teaching so much the better in terms of encouraging diversity.

One of the problems the universities contend with now is the effort that must go into seeking, justifying, accounting for and reporting on funds for research. It would be irresponsible to proliferate unnecessary bureaucratic machinery and consume valuable professorial time in an essentially artificial competition for essential funds. If universities think they can generate more general revenues from the province because they are active in sponsored research, there will surely be a strong tendency to promote research at the expense of teaching. That which the Commission seeks to avoid would be reinforced. Universities would be pressured further into research-seeking. Far from reducing steering effects, separation of research and teaching would increase them. Surely the U.S. experience warns against this.

We have simulated the application of the specific proposal to the distribution of 1970-71 university basic operating income.[10] "Research" funds remaining after application of the suggested instructional weights in Table E-3 approximate $105 million with *only* $6 million generated for the four emerging universities and with but another

[5] See for example, the background study (*Cost and Benefit Study of Post-Secondary Education in Ontario, School Year 1968-69*). The authors acknowledge that their model suffers from great conceptual and data problems and warn against falling into "the trap of attributing to numerical estimates a greater significance than can be borne by the analytical approach that has been employed, the assumptions that have been made or the data that have been used."

[6] Northrop Frye, *Globe and Mail*, March 18, 1972.

[7] Committee on Operating Grants, *Comments on the Recommendations for Separation of Research and Instruction in the Draft Report of the Commission on Post-Secondary Education*, March, 1972.

[8] *Fundamental Research and the Universities*, (Paris: Organization for Economic Cooperation and Development, 1968), p. 78.

[9] Macdonald, J. B., et al, *The Role of the Federal Government in Support of Research in Canadian Universities*. (Ottawa: Queen's Printer, 1969).

[10] See the Committee on Operating Grants *Comments* ... for the detailed analysis.

$10 million for Windsor and Carleton. Six universities thus account for only 10% of the derived research funds. Is it proposed that there would be distribution of funds *away* from these universities or *to* them? Or would a provincial research council attempt to develop criteria (without counting or weighing publications) and create a bureaucracy to apply these criteria and yet not change the distribution a great deal? The COU Committee on Research and Planning speculates on the reason for this proposal, ". . . one suspects that the intention many be initially to withhold funds from the four emergent universities and so to revoke their university status. If the older institutions feel any temptation to support this scheme in the hope that they would thereby get more of the gravy, they will be well-advised to think twice. A large sum of money, not earmarked for objective distribution under the formula, intended for promoting research and so keeping alive 'the shibboleth of "academic" standards', will be a prime target for the economizer's axe or for shifting to other purposes."[11]

The CUA/COU Joint Subcommittee on Finance will table an interim report shortly which identifies the main issues in formula financing of university operating expenditures. Research has been identified along with libraries and computer resources as possibly requiring special attention because these needs are not necessarily directly related to the student number base of the present formula. Some U.S. jurisdictions use different formulae for different functions. *It should be noted that where such systems exist, there is a large bureaucracy and much more government control.*

Despite our reservations, the question of special treatment of basic and applied research is important enough to refer to the Joint Subcommittee on Finance for study. *We are opposed to any change would artificially allocate research funds through an arbitrary separation of research and teaching.* We are not opposed to studying the means by which the distribution within the system could be improved including appropriate methods for supporting indirect costs of research. The nature of such studies requires that there be extensive consultations between federal and provincial governments.

The instruction model in Appendix E

Footnote 4 on page 43 of the Report directs the reader to Appendix E, for justification of the separation of instructional from research costs which leads to the educational cost table (proposed grants and fees) on page 44.[12] The "hypothetical" cost allocation results from *arbitrary* alterations in faculty contact hours. For instance, the average of faculty contact hours in general arts and science is raised from the estimated current value of 9.6 to 13, increasing the student/faculty ratio from 17.8 to 24.

"On page 109 of the Draft Report is quoted an example of class scheduling which yields an average class size of 40 students. While it is obvious that if one-fifth of all classes contain 125 students, one-fifth 50, one-fifth 15, and two-fifths 5, the average class size is 40 students; however, the Report ignores the equally obvious fact that in such a situation the typical student would spend 12.5 hours out of 20 contact hours per week in classes of 125, 5 hours in classes of 50, 1.5 hours in classes of 15, and only 1 hour in classes of 5 "[13]

The implication of such calculations is that the teaching function in university is considered to be less demanding than in secondary schools. (The student/staff ratio in secondary schools is about 17 versus the proposed ratio of 24 for general arts and science in university.)

It is stated that the model is hypothetical. Even a hypothetical model should bear some resemblance to reality. The proposal to divide funding of research and teaching is based upon an inappropriate instructional "submodel" of the university (Table E-3); the research submodel is therefore implied as the difference between Table E-3 and the present case, Table E-2. The entire case for separation is invalid because the model is invalid. According to this model Ontario universities would become basically teaching colleges with add-on resources for research *provided the research could be justified to Government.* The view of faculty activities underlying the hypothetical calculation betrays a profound misunderstanding of the nature of academic life.[14] Tutorial, student counselling, administrative and professional activities of faculty are ignored in the model. Only provincial operating funds and fees are included in the model. Sponsored research and other non-formula funds are not included and therefore assumed to be neutral in their effects. The model is sensitive to changes in parameter values. If the values are incorrect or chage over time they produce changes in the results. We have no confidence in the assumptions about percentage of faculty salaries and average salaries shown for each category, nor do we believe the values chosen reflect the *real* contact hours per week. Unit costs based on arithmetic averages of class size may be less valid than ones based on other measures, the harmonic mean, for example, as indicated in the above illustration.

[11] Committee on Research and Planning, *Critique of the Wright Report*, p. 18

[12] Appendix E presents an overly simplified algebraic model accompanied by heavily subscripted notations. An attempt is made to provide approximate current values for the model variables thus yielding Table E-2. Average faculty contact hours is then *arbitrarily* increased from 9.6 in the case of general arts and science to 13.0 with other values held constant. Similar arbitrary increases are made for the other categories. Table E-3 results from this operation.

[13] *Report of the Senate of Trent University on the Draft Report of the Commission on Post-Secondary Education in Ontario*, pp. 6-7.

[14] Committee on Research and Planning, *The Ten O'Clock Scholar?*, April, 1972.

Proposals for financing post-secondary students

We wish to direct the Commission's attention once again to *Accessibility and Student Aid*, a report prepared by the Committee on Student Aid and published by COU in May 1971. *Accessibility and Student Aid* examined several questions in considerable detail: the state of accessibility to higher education in Ontario, the successes and failures of OSAP, costs and benefits as they relate to equity in student aid arrangements, and alternative student financial aid schemes. Special attention was given to educational opportunity bank schemes and the question of equity.

We are pleased that many of the underlying principles outlined in the Draft Report closely parallel those stated in *Accessibility and Student Aid*, but are apprehensive about most of the Commission's specific recommendations and the lack of information accompanying those recommendations. In short, we feel that the call for increased accessibility goes in one direction and the proposed student aid scheme in the opposite direction. We are concerned that the Commission dismisses, without discussion, the existing student aid programme (OSAP) which has already made post-secondary education more accessible to lower-income students (*Accessibility and Student Aid*, Chapter I). We are now asked to accept a new student aid scheme of unknown benefit and unspecified cost.

Deficiencies in student grant proposals

What will be the amount of the maintenance portion of the grant? Should this maintenance portion be too low, these grants would not enhance accessibility. How many students may be expected to receive full support? The Commission has based its proposals on the income of *all* Ontario families although in fact the income of families with university-age children is the appropriate base. Wage-earners in this group are approaching peak earnings. Few are in the lowest quartile. Consequently, few students would be eligible for full support. In addition, no mention is made of the effect of family size on the need for assistance.

"The Commission has not noticed that its scheme creates enormous work-disincentives for families in and near the second quartile, and for their children. The problem has become familiar in the literature of welfare programmes, and has been extensively discussed in connection with the negative income tax.

"Suppose a family has a before-tax income of $7,499, and that it has two children in university. It gets a grant of $4,000. Another family earns $10,001, and also has two children in university. It gets no grant. The first family is obviously better off: its total income, including grant, is $11,499! For a very large fraction of the population, the Commission's scheme thus involves direct inducement to *reduce* earned income! These difficulties occur because the grant is large relative to the income-range over which it must taper from full-maintenance to zero. They can be eliminated by widening the income-range over which this taper occurs, by reducing the "full" grant, or by doing both."[15]

What will the province be expected to spend? In view of the widely expressed concern about the escalating cost of OSAP, it would be reasonable to expect the Commission to estimate the cost of its proposed scheme.

Recommendations 66 and 68 make a large amount of money available in the form of grants to persons who have not followed a sequential, institution-based educational pattern. The fact that a particular individual did not personally obtain a post-secondary education does not mean that he did not tap the resources made available in society by the post-secondary education system. Surely the financial needs of applicants from these two groups should be assessed and the size of the grant determined accordingly. It is disappointing that the Commission should cut off from grant aid a sizeable majority of the student population and then offer large grants to individuals and groups whose financial needs have never been determined.

Deficiencies in student loan proposals

The loan segment of the Commission's proposed student aid scheme, which would necessitate huge debts for so many students, would have profoundly undesirable effects both on individual students and on the universities.

A sizeable majority of students, especially those from larger families, would collect substantial debts starting in the first year of their university studies. For this group, the prospects of proceeding without interruption to studies beyond third year would be very dim. A student leaving university after third year, saddled with a heavy debt and growing interest would be unlikely ever to return to university. By the time his debt has been paid off, he would probably be saving for his own children's education. The student from the middle-income group is caught tightly in the squeeze created by the Commission's proposed student aid scheme. On reflection, can we really any longer call the scheme one of student "aid"?

Similarly, students from the lower-income groups, who may have received *some* grant aid for the first three years of university study, are offered only loans after the third year. Surely there is now ample evidence that low-income families are very reluctant to incur debt for educational

[15] Ian Drummond, *Accessibility and the Wright Report*

purposes. Students from these families are unlikely to proceed beyond third year. In short, stratification among levels of study is increased, not lessened. Only the more wealthy will continue their education beyond third year.

The Report does not recognize the place of foregone earnings in the student's contribution to his university education. Foregone earnings *are* a cost to the student. After each year the student successfully completes, his foregone earnings rise. An interesting situation soon arises for the large majority of students: as the student advances, his fees rise, his debt grows, and his foregone earnings increase. (His foregone taxes will also rise, but these will always be lower than his foregone earnings.) He is thus placed in what might be called a "triple bind."

The Commission's proposed student aid scheme will also affect the courses chosen by students. Selective pressure will be brought to bear on those courses of study which are unable to offer high expected earnings immediately after graduation. In spite of the fact that loan repayments are contingent upon ability to pay, the fact of the matter is that some persons will be able to opt out in a fairly short period of time, while others will see themselves yoked to fifteen years of payments.

The Commission admits that its scheme favours those who live at home. It is unlikely that all or most programmes will be available in all or most places, with identical quality. If all opportunities are to be available to all students, we must allow students to go where the opportunities exist without financial penalty. How can the Commission praise differences between institutions and then penalize the student who examines those differences and then decides to attend a university outside his home town? What are the implications for those institutions which rely on receiving students from other parts of the province, especially when many institutions are already facing problems meeting their enrolment projections? The Commission argues that "consumer's choice," backed by "purchasing power," will help Ontario institutions "provide educational services that are more in keeping with what is really wanted." As we have argued, financial constraints, not consumer's choice, will determine demand.

The argument was presented in *Accessibility and Student Aid* that no loan scheme can be implemented at any level other than the national one. The Council still subscribes to this view. A loan scheme operating solely in Ontario will be plagued by the problem of "fugitive serfs." The costs of retrieving the loans from these people will be large. While the Commission may of necessity have had to omit some administrative details, we feel that the problems of securing and enforcing repayment are not minor ones.

The Council agrees that loan repayment based on income is desirable. The important issue is the amount to be repaid. We submit that the proposed student aid scheme would impose the burden of immense debt on large numbers of students who could not afford to attend university on the basis of their families' incomes.

This issue leads us to a rather thorny problem not tackled in the Draft Report. Assuming the Commission intends the loan scheme to be self-supporting, the interest rate and repayment period must be carefully selected if "good risks" are to be attracted into participating in the scheme. Failure to attract these "good risks" could necessitate the infusion of a substantial public subisidy or an increase in the interest rate and repayment period to make the scheme self-supporting. In the latter case, "good risks" would then be even *less* likely to participate in the scheme.

The problem of women who marry is, we grant, a difficult one. The Commission's recommendations propose a direct inducement to marry. We do not feel that the Commission has really confronted the problems of the treatment of women in any loan scheme. Why not make both parties responsible for their loans regardless of whether they are married or not? Surely this would be more in keeping with equal status for women. If repayment is contingent, the family does not have to fear the burden of debt for a non-working wife.

Tuition fee proposals would raise the barriers to accessibility

The Commission recommends substantial increases in student fees. We oppose fee increases of the magnitudes suggested and any increases unless matching grant money is made available to all deserving students. We seriously question the methodology of calculating instructional costs and the rationale used by the Commission in arriving at the 50% figure for the student's contribution. We have not seen any of the Commission's "test runs". While it is true that current levels of fees for many students would be "relatively undisturbed", for many students the changes would be drastic. For many CAAT students the increase would be fourfold ($150 to $625). For graduate students the increase is threefold (from $485 to $1,500), and for students in applied health fields in the CAATs the increase is nearly ninefold (from $125 to $1,100). What would be the effects on recruitment into such fields? The proposed groupings of disciplines for fee purposes take no account of the differential prospects for earnings between disciplines within these groups. How many students would enter the low-paying para-professional health fields at an $1,100 fee, when they could take applied arts or business for $625? Does the Commission really believe that its loan proposals could offset such effects? In fact, given the weight of the financial burdens imposed by the loan

scheme and the increase in fees, we believe that accessibility to many fields would be sharply decreased.

Finally, what would be the effects of such fee levels on inter-provincial and international migration? Ontario does not exist in a vacuum.

Premium scholarships at the graduate level are essential

The only direct reference in the Report to graduate student stipends is the reluctant endorsement of the establishment of "premium scholarships" at the graduate level (Recommendation 69). Graduate student support is a complicated field, involving scholarships, payment for services and research grants from federal, provincial, industrial and other sources. COU and CUA are currently examining the issue of graduate student support with a view to delineating a new programme for the provincial component of direct support beginning in 1973. We hope the Commission will give thoughtful consideration to the proposed scheme.

COU endorses its previous position on student aid

COU does not believe that the proposed scheme for financing post-secondary students promotes accessibility, nor that it is either viable or equitable. Further, the thrust of the Commission's recommendations on grants and loans is inconsistent with the aims of improving accessibility. Implementation of these recommendations would therefore be counter-productive. We endorse once again *Accessibility and Student Aid* and the recommendations contained in that Report.

Financial impact of providing more accessibility needs study

We are in favour of integration of formal education and work experience in the appropriate disciplines (Recommendation 4), and of part-time students receiving aid at the same level as full-time students (Recommendation 9) provided that each grant reflects each applicant's assessed need and commitment of time to courses of study. We agree that makeup courses for students out of school for more than three years should be provided tuition free (Recommendation 66) but are concerned about where the funds would come from to support this and about the inevitable questions that will be raised by other students taking the same courses who have not been out of school for three years. Institutions for adults should be eligible for grants (Recommendation 13). With respect to equal funding of alternatives to post-secondary education (Recommendation 68), we cannot react until we can see what the specific alternatives are. The costs of funding alternatives would have to be assessed against the benefits to the individual and society.

In summary, we approve of the general direction, but we would like to see more specific recommendations with more details about expected benefits for the approximate expenditure levels that will be required.

A University of Ontario and new campuses would impose great financial burdens

There is much sympathy with the idea of creating a University of Ontario (Recommendation 21). A different model was proposed in *Towards 2000*. It is a feasible alternative for university education in Ontario but one of the main reasons for our immediate interest in it—the expected crush of students over the next decade—now seems to have disappeared because of the recent phenomenon of students failing to enter university and others stopping out once they are in. (It appears that the things that the Commission wishes to legislate are simply occurring as a result of student decisions.) Still, we would endorse the proposal on the understanding that it need not be a crash programme and that the purpose is to open up alternatives to university education for those who can not get it or choose not to get it in the traditional way. It will be costly however even if we do not adopt in full the original plan proposed by Bernard Trotter.[16] Experience elsewhere has shown that the development of one credit course can cost in the neighbourhood of $200,000.

The creation of new "store-front" type campuses of 200 to 1000 students is another matter (Recommendation 19). There is objection on academic grounds and on financial grounds to any unwarranted proliferation of uneconomic quasi-university establishments. The Committee on University Affairs has criticized the proliferation of programmes and departments, yet indiscriminate proliferation of campuses is advocated by the Commission. To provide a reasonable standard of quality, unit costs would undoubtedly be higher than in existing institutions. Start up costs spread over a small number of students will always yield high unit costs in the first several years of existence. Also, human nature is such that once a need has been developed and met, other needs will emerge. Once new institutions have been created, pressures will develop within them and from the surrounding community to serve other purposes. We should be cautious about launching new institutions which will become active competitors for limited resources—especially if there is no clear need for such institutions. Any developments in this

[16] Bernard Trotter, *Television and Technology in University Teaching*

line should emerge at least initially out of cooperative "branch operation" arrangements between universities and CAATs.

Laurentian University comments that "The Report advocates proliferation of small degree-granting institutions. . . . The closing of many of the General Arts Colleges in the United States and Canada during the last decade seems to show that the main thrust of education is going in a different direction, namely that of multi-faculty and diversified campuses. Recent trends in education and the needs of society point to the inter-relatedness of disciplines. The creation of any institution which cannot make available to its students the diversity of disciplines (Arts, Sciences, professional) is bound to offer an education less relevant to meet the challenge and complexity of today's world."[17]

A combined operating and capital formula would present problems

With respect to the creation of a single formula for operating and capital funds (Recommendation 71) we have great doubts. In our view the two funding needs should be considered together but once decided upon they should be distributed separately. The Committee of Finance Officers—Universities of Ontario has noted that if these funds were not separated it would be difficult to resist recurrent demands for such items as salary increases and books, thus depleting a capital reserve for long term needs of plant maintenance and replacement. Further, they point out that, "In the past the operating formula has been based upon the number of students attending an institution each year. The capital formula has been based upon only the increase in the number of students from one year to the next attending an institution. The funding of operating costs has been from current provincial sources and capital costs from long-term, thirty-year debt. These differences in bases make it difficult to understand how one . . . formula could be developed to provide for the same considerations."[18]

The COU Committee on Capital Financing also has expressed reservations about combining operating and capital grants. It recommended previously that a final approved capital formula should be developed and tested in practice for a minimum of two years prior to any trial of a combined formula. It further recommended that a special study group should explore the benefits and disadvantages of combining the formulae—such study to include funding practices between capital and operating in other university systems, in government, and in large private and public corporate structures."[19] We think that these earlier recommendations are still valid.

Other funding proposals approved in principle

We agree with the proposal to have the same standards for capital funding of CAATs and universities (Recommendation 70), for similar activities. We welcome the suggestion that announcements of operating grants and subsidies should be made over rolling three-year periods. We agree with the proposal that operating funds should be distributed by formula except that we believe that 5% being held back for innovation at the government level (or coordinating board level) is too much (Recommendations 52c, d). Line item control of a small proportion of the budget means virtual control of the whole budget. Five percent of the present level of operating support would be $20 million. The total increment for the universities in 1972-73 may be about this amount. Universities should be encouraged to reserve funds released by retirements, resignations, etc. for special review with the object of reallocating funds to new purposes as new needs arise. Universities and government should share responsibility for ensuring that new needs of society receive attention.

[17] *Laurentian University's Response to the Draft Report on Post-Secondary Education*, March 8, 1972.

[18] Committee of Finance Officers-Universities of Ontario, *Comments on the Draft Report of the Commission on Post-Secondary Education in Ontario*, February 23, 1972.

[19] Committee on Capital Financing, *Comments on Sections Relevant to Capital Financing*

COMMITTEE ON RESEARCH AND PLANNING

We welcome the opportunity to comment on the Draft Report of the Commission on Post-Secondary Education in Ontario before the final report of the Commission is presented to the Government of Ontario. The Draft is an interesting, imaginative document, embodying a fresh perspective on post-secondary education. The emphasis upon making such education more widely available is particularly welcome. The Draft stresses the concept of education as a life-long process, and focuses public attention on the importance of the agencies of informal education—the libraries, theatres and museums—which will become increasingly important as the emerging pattern of our lives produces more leisure time for more and more people.

In its treatment of the more formal parts of the system of post-secondary education, the Draft pays tribute to the strong tradition of diversity among Ontario institutions, which it says should be continued. It envisages a thoroughly commendable degree of flexibility. It would facilitate vertical and lateral mobility within the system by recognizing many routes to higher studies—not only direct from high school but also through the colleges of applied arts and technology and through relevant work experience. It would provide for greater mobility from paraprofessional to professional courses. It would create more opportunities for educational upgrading, refreshing, and recycling in later life. Above all, it would give the widest possible availability of access to higher education through a "University of Ontario" along the lines suggested in *Towards 2000*.

Because it is a Draft Report, and apparently incomplete, there are certain difficulties for us in making comments. We do not know, for instance, what the Commission's intentions are regarding the treatment of important parts of their terms of reference which are not dealt with in the Draft. Specifically, the Draft Report does not deal (except in very general terms) with "the type, nature and role of the institutions required to meet the educational needs of the Province with particular reference to existing institutions and their ability to meet present and future demands." There is no reference at all to the ability of existing institutions to meet present and future demands. Since we are especially concerned about the way in which the planning of the university sector should proceed, we want to give special attention to this topic, but we do not know whether the Commission intends subsequently to give any systematic attention to this part of its responsibility. Nor do we know whether it intends to study and report —as another of its terms of reference specifically requires —on "the facilities required to meet needs, including specialized facilities such as research laboratories, libraries, computer facilities, etc." And, indeed, in a final report the Commission may well wish to improve upon its scanty treatment of two other important matters: numbers of students, and costs.

We face a somewhat similar difficulty with respect to apparent contradictions in the Report when we are asked to view it as an integrated whole. It is difficult to guess the extent to which the Report has been issued in its present form as a stimulus to further discussion. It is possible, too, that the inconsistencies are caused by obscurity in the phrasing, or result from the inherent difficulties in reaching a consensus among a varied group of persons. We can do no more than take the substance of the Draft at face value as we read it. If we misinterpret the words, we trust that clarification will be forthcoming. Where our differences with the Report are substantial, we look forward to the opportunity of discussing them with the Commission.

The Philosophical Basis of the Draft Report

The keynote of the Report is pan-accessibility. The Commission seeks a democratization of the educational system and a corresponding breakdown of the power of professional organizations to control entry and standards in the job market. It also seeks to make discrimination in employment on the basis of educational qualifications illegal. Thus, rather than being a scarce resource available to a few who can exploit it for their own advantage, higher education becomes widely available, easily obtainable, and irrelevant to occupational success.

The focus of the Report is therefore social rather than educational. The Report scarcely concerns itself with educational aims *per se*—other than to nullify or at least downgrade traditional educational values by such references as "our shibboleth of 'academic' standards" (p. 20). Quality—related to excellence—is constantly confused or equated with élitism, understood as exclusive and restrictive; an élitist ghost lurks behind every bush. Degrees are referred to as paper credentials (p. 20); they are to be downgraded and proliferated so that they will become valueless in the eyes of the public who unfortunately are still stupid enough to pay some attention to them.

(These recommendations about degrees may actually increase the stratification in the system, creating first-class and second-class degrees. Furthermore, the idea of divorcing educational attainment from employment criteria would erect an artificial barrier between education and work, which employers would surmount in some way: if

they cannot have a BA to go by they will probably enlist the aid of management consultants and make up their own recipe of necessary "credits," and thus influence educational programmes more directly than they do now. And, apart altogether from educational goals, the question arises: is it *socially* desirable to spread out opportunities for young and old to earn degrees and at the same time cynically to debase their value? or is it something of a "rip-off"?) . . .

The consistent educational philosophy that underlies the Report . . . is clearly the philosophy of the new education, exemplified most notably in the Cultural Revolution in China which sent students and teachers back to the farm or the factory to break down the often artificial barriers between education and life or work. It is education for practical purposes—education interwoven with work in society. What seems to be anti-intellectualism in the Report is really anti the Mandarin type of intellectualism that we are accustomed to, with its stress on tradition and on the values and standards of the past. The Mandarinism of the professions is singled out for particular attention.

This philosophy seems to have reached the Commission through Ivan Illich, to whom the Commission is known to be greatly beholden. One of Illich's goals is to liberate access to knowledge and experience by abolishing the control which persons and institutions now exercise over their educational values.

More than half of the Commission's recommendations are directly related to this underlying philosophy. . . . (It turns out that the "control which persons and institutions now exercise over their educational values" is simply transferred to a government board; one must question whether access to knowledge and experience is thereby "liberated.")

In this area of government controls, one notices the omissions in the Report. There is practically no reference to the Government of Canada except as a cow that might be milked. There is no recognition of the federal government's interest in the supply of highly qualified manpower, or of the necessity for a national economic policy, or of the problem of regional equalization, a problem to which education has a fundamental contribution to make. There is no acknowledgment of the federal initiative in student aid, and no conscientiousness about making Ontario's actions coordinate with what is going on in the rest of Canada. There is no sense or responsibility for international commitments and opportunities to assist underdeveloped countries in their own educational development (another echo of Illich, perhaps). There is no mention of the fact that most of the cultural organizations like theatres and galleries get most of their public subsidy from the federal government and the municipalities. No attention whatever is paid to the development of regional, as distinct from central, authorities throughout Ontario, in spite of the decentralization that is taking place in many spheres, and in spite of the lip-service that is paid to local initiatives and the importance of the individual. Post-secondary education is seen from an outlook that is wholly provincial, and control of post-secondary education is to be totally centralized in Queen's Park.

The Commission has accepted an "inner logic", a kind of historical determinism. They say that there will be less quality, less autonomy, more government control, because they believe that these are trends, and, therefore, inevitabilities. They decline, accordingly, to discuss whether there *ought to be* less quality, less autonomy, et cetera—they simply say there will be. This would be a tenable approach if their historical determinism were based on a sounder grasp of the educational history of the province they are in. They recognize that the "veritable vortex of changes" and the "giddy gyration of growth" (p. 7) tend to confound long-term historical trends with immediate problems. But the four paragraphs they devote to history (pp. 7-8) are superficial and imperceptive. They fail to see any of the features of the Ontario educational system that are either unique or relatively unusual. (An educational historian has pointed out that such unusual features are of particular importance since they reflect the special interests or the special prejudices of the people of the province, which have evolved in the course of decades or centures.[1]) The Commission states (p. 10) that they have found the Ontario system less bureaucratized and less rigid than practically any other such large system. But they turn a blind eye to the quiet evolution that has taken place, *and is still taking place*, that has enabled Ontario to move with or ahead of the times without excessive bureaucratization and rigidity. The entire network of voluntary coordinating bodies that has developed since 1962 under the aegis of the Council of Ontario Universities is deliberately ignored.

The Commissioners are not the only observers who have found that Ontario's system compares favourably with others. Professor R. O. Berdahl has commented that in the area of the relations of academic institutions and government bodies, Ontario has achieved a unique and enviable solution to a universal problem. . . .

Implications of the Report

Accessibility

Accessibility through wider geographic availability of post-secondary programmes is highly desirable; whether *all* the recommended affiliates, satellite campuses and

[1] R. S. Harris, *Quiet Evolution.* (Toronto: University of Toronto Press, 1967), p. 36

small private colleges will be needed as well as the University of Ontario will depend, presumably, on the extent and locus of the demand. If the University of Ontario, instead of being in the "open sector," were established as a self-governing institution and included in the university sector, it would achieve credibility in the academic world and avoid the stigma of conferring second-class degrees. We believe that this should be done, even though the Commission would regard this as another manifestation of our outmoded obsession with standards.

Regarding financial accessibility, the provision of grants *for three years only* will hurt people who are poor and will greatly reinforce the existing over-representation of higher-income groups in the professions. The decision of a student to participate in one form of education or another is certain to be influenced by the three-year limit proposed for grants. Low-income families exert tremendous pressures on students not to take on debts; the students may be willing enough but their families resist, especially if they themselves have had trouble with debts. Moreover, as has been pointed out elsewhere, an ethical principle is violated if only the lower-income groups are obliged to accept the penalty of going deeply into debt for their education. "When the benefit conferred imposes a penalty (fifteen years of indebtedness at prevailing interest rates) which is not required of others who enjoy the same benefit because their parents can afford to help them, this is scarcely equitable. It is a fine-sounding phrase to ask at what stage does the individual 'accept his share of responsibility for meeting society's goals', but under this proposal, only the poor would be faced with accepting such responsibility."[2] The Commission has recognized equity to the extent of a three-year course, but not for graduate or professional studies. We wonder whether the Commission has noticed that a basic philosophy derived from Ivan Illich combines incongruously with a capitalistic student aid programme based firmly on Adam Smith.

The alternative that we would favour is a continuation of the much more flexible OSAP scheme, with such adjustments as are required to produce a better deal for returning students. We would point out, as well, that if parental income is to be brought into the equation where formal education is concerned, this should surely apply to the informal kind of education as well; no means test is mentioned in connection with the $15 million to be distributed under Recommendation 68.

Individuality

We agree wholeheartedly with the Commission's stress upon the human individual. Yet the lottery idea in Recommendation 30 is a "cop-out", leaving to chance the admission of the best and most promising human individuals. If we really think in terms of meeting social needs in, say, the distribution of health manpower, some selection that relates to geographic factors and to ethnic groups is essential; this benefit would be cancelled out by the lottery. . . . If it is imagined that the lottery will even out the bias towards higher socio-economic levels in the professions, it won't—there is good Canadian evidence that that selection process occurs far earlier in the course of the educational system, rather than when the applicant pool is already formed and selection is being made for the course. . . . If one favours a lottery one must assume either that all citizens are equal in talents, needs, genius and creativity or that those factors should be dismissed. . . .

Centralization

The hierarchy of government-appointed committees and the powers recommended for them in the Report constitute its most frightening aspect for those who still believe in a free society and know the role of universities in preserving freedom. It is idle for individual Commissioners to say that the words in Recommendation 49 to 54 really mean something else, or that the freedom taken from the universities in No. 52 is something that they have lost already. Ontario universities share the heritage of freedom of thought and inquiry that the free world has cherished. . . . When we have a government-appointed body with a non-academic majority empowered to abolish courses—to say what may or may not be taught—we are potentially not far removed from Orwell's Ministry of Truth, except for the uncomfortable feeling that we are likely to find the Ministry of Truth a truism long before 1984. . . .

The references that have been made to this part of the Report by some of the individual Commissioners raise serious questions of interpretation. For example, the "representing" of industry, labour and other lay public groups on the proposed coordinating boards has been defined in terms of their participation as instructed delegates of powerful interest groups—a syndicalist approach which is utterly foreign to the political traditions of English-speaking Canada.

The alternatives that we propose for consideration are: a Committee on University Affairs that would be wholly advisory, not co-opted through drawing its staff from a government department; a devolution of considerable authority to regional boards throughout the province; and/or the assumption of certain direct responsibilities by the federal government, as suggested in *Towards 2000*; with, in all cases, *the individual universities retaining control of their admissions and curricula.* It cannot be stated too strongly that when courses are established and abolished by an extraneous central governmental authority, the institutions offering those courses no longer deserve to be called universities.

[2] *Towards 2000*, p. 148

Finance

The financial arrangements recommended will involve much higher tuition fees, with the discriminatory effects we have mentioned against the very poor, and requiring considerable sacrifice from those families in the $10,000 a-year range. (The middle classes, Professor John Porter comments, are likely to rebel as they become increasingly the recipients of burdensome taxation demands and decreasingly the recipients of welfare paybacks. We live in a society which apparently thinks it can let the rich go free and subsidize the poor through the middle income groups.)

Besides tuition income, the university sector of the post secondary system will receive formula grants for a greatly diminished proportion of their expenses and must take their chances of persuading the government to give them any funds at all for what the Commissioners have defined as "research." This part of the Report is the most confused and fragmentary section of all. Nevertheless, analysis shows that the Commission's arbitrary separation of instructional costs from the costs of the research—research which *they admit is essential to instruction*—will reduce by almost one-third the governmental responsibility under objective formula financing, and will produce a sum (estimated at more than $100 million) which they will be able to distribute as they please and reduce at will. One suspects that the intention may be initially to withhold research funds from the four "emergent" universities and so to revoke their university status. If the older institutions feel any temptation to support this scheme in the hope that they would thereby get more of the gravy, they will be well advised to think twice. A large sum of money, not earmarked for objective distribution under the formula, intended for promoting research and so keeping alive the shibboleth of "academic" standards, will be a prime target for the economizer's axe or for shifting to other purposes.

With all the Report's promises of generous treatment of other institutions and new ventures, plus its thoughtfulness for the taxpayer, one requires no clairvoyance to pick the loser in the financial stakes. . . .

> The more egalitarian a society, the more all are equal. Given the personality variations of history and endowment there will always be differences from person to person but they will always be the smaller the more egalitarian the system. An egalitarian system of education will both lift up the bottom group and lower the top group towards the middle. And it will do so the more egalitarian the system.[1]

This kind of society is the aim of the Draft Report of the Commission on Post-Secondary Education in Ontario. They believe in it deeply, and are ready to destroy much to bring it about. What the public has to decide is (a) whether they accept this aim at all, and (b) whether, if they do, they accept it as a *sufficient* aim. It seems likely to us that people will accept the aim, especially younger people, who will want to move quite quickly in the direction of a more egalitarian society, and that many cherished Mandarinisms will go by the board. The second question is more important: is this a *sufficient* aim? Are destruction and levelling-up and levelling-down enough? or should room be left also for the free spirit, the creative thrust, the genuine innovation? Those of us who believe that this creative thrust exists now in the system as it has evolved, and that it is increasingly influencing the direction of our evolution, will want something better than the regimented egalitarianism that the Commission offers in its Draft Report.

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[1] Bruno Bettelheim, *The Children of the Dream*. (London: Macmillan, 1969), p. 297.

COMMITTEE ON OPERATING GRANTS

Comments on the Recommendation for Separation of Research and Instruction

Recommendation 61 of the Draft Report says that the public subsidy for institutional operating costs of post-secondary education should be divided into two categories: a) the subsidy for educational or instructional expenditures, calculated in a manner indicated in the introduction to the section, and amounting to 50% of such costs and b) payment for research and other activities, on a long-term basis (no fewer than five but no more than ten years). Further, the public subsidy should be allocated to each institution in one lump sum, with the first component part based on objective criteria.

The recommendation has enormous policy implications. Hiking fees to 50% of arbitrarily determined instructional expenditures must be questioned on the grounds of social return, and what appears to be a retrograde step in educational policy in the province. This will be dealt with in other papers. The questions we wish to raise here are concerned with the appropriateness and the possible effects of splitting the provincial funding of instruction and research. This part of the recommendation

proceeds from a statement on page 43 that "it is possible to identify university research costs and to separate them from direct instructional costs" and that this is shown in Appendix E. In fact, it is not shown in Appendix E nor is it possible to separate instruction and university research (i.e., non-sponsored research) in other than a completely arbitrary way. It was pointed out in Towards 2000 that ". . . . university teaching aimed at fulfilling its highest aspiration, that of generating a spirit of critical inquiry, cannot be divorced from research . . . . [without] research as an integral part of the academic system, the student and society cannot gain the qualities of criticism and renewal which the university must create if it is to be a distinctive and crucial institution".

University research is vital to a university being a university but it varies from university to university, from discipline to discipline, and by level of programme. Activity studies have shown that departmental research can vary from 15% to 40% of the total time of the academic depending upon what activities are subsumed under the rubric of *research*. If general reading and study carried on in evening hours and in the off-terms and scholarly research to enable one to remain at the forefront of his discipline are included, the percentage will be on the high side of the above range—if not, it will be on the low side.

There is variation among the disciplines and the level of university research varies inversely with the level of sponsored research that is shown in activity studies. (Professors taking part in such studies who, by their responses, have indicated that a great deal of time was spent on sponsored research activities also indicated low levels of university research and vice-versa). In any case, it is not possible to determine the division between instruction and research accurately or consistently and no matter what figure is chosen there will be disagreement within the academic community about whether or not it is the right figure. It will thus be a very arbitrary figure as indeed the model of Appendix E implicitly assumes. (The difference between a standard of 13 hours times 3 and the present average faculty contact hours scheduled per week). *It must be accepted then that any division will have to be an arbitrary one based upon whatever evidence the people making the division can cite to buttress their case.*

Paragraph 5 on page 43 of the Draft Report states that is "assumed that the funding of research will not be immediately affected, but that the allocation of these funds will be based in the future largely on the overall research performance of the institutions. The idea that governments should finance and account separately for education and research is not new. It was advocated by Joseph Ben-David in 1968 in a paper presented to the Organization for Economic Cooperation and Development (OECD)".[1]

[1] Joseph Ben-David, *Fundamental Research and the Universities. Some comments on Inter-national Differences*, O.E.C.D., 1968.

The Draft Report quotes only a portion of Ben-David's recommendations. The full text of his comments on this subject are as follows:

> Governments should decide separately on the total budgets to be spent on (1) higher education and (2) fundamental research. The budget for higher education should be allocated to all the recognized institutions on the basis of the numbers of students, weighted according to fields and levels of studies. The institutions would however be free to charge any additional tuition fees, or establish any criteria of admission (above the level of a common minimum) and spend the money in whatever way they wished. Special considerations, such as important public interest in certain fields of study or in the development of a given area would be given proper weight by increasing the per capita allocation.
>
> Part of the research funds should be allocated to the institutions on the basis of the overall attainments of their staffs in research. Different fields could be given different weights. The measurement of the attainments would present a serious problem, but it could be done. The best way, probably, would be to establish in each field international panels of judges in order to grade departments on a composite scale, such as publications, overall excellence of members, and contribution to training researchers over a period of time. The institutions would receive a total sum arrived at by the measurement of their past performance over a period of, say, five years. They would be free to use this sum in any way they wished and to solicit further funds from anywhere they could. The institutions would also be free to pay any salaries—perhaps within some upper and lower limits—and to organise teaching and research, however they thought fit.
>
> The other part of the total budget for fundamental research should go to individuals or groups of researchers as grants for specific projects. This should serve as a counterweight to institutional tendencies of spending research funds on administration, and to establish (and subsequently preserve and refine) the practice of accounting for the cost of research. On the other hand it is not suggested to follow United States practice which has made project financing the almost exclusive means of research support in several fields, because this would only enhance the excessively individualistic tendencies of the Western European system (it has probably done considerable harm to academic organisations in the United States too).

In a sense Ben-David's recommendations are lifted out of context. His comments were made in recognition of what was seen to be a specific failure of European institutions to get proper return on investments in university research. His recommendations are intended to move them away from inefficiency. As he says,

> At the present time the European university is inefficient as a whole as well as in its constituent units: the chairs and institutes attached to chairs. . . . The 'chair' was originally based on the assumption that a single person is capable of representing, more or less on his own, a whole, so-called academic discipline for about the lifetime of a generation; the institute added to the chair is based on the idea that the holder of a chair is capable of inspiring and guiding single-handedly the research of several apprentice researchers, again for about the lifetime of a generation.

Ben-David goes on to contrast the history and organization of higher education and research in various European countries with that in the United States as follows:

> The changes in the organisation of teaching and research within the university undertaken in the United States

around 1900 reflected the most advanced trends, and not the actual state of affairs, in the German universities. Advanced students visiting Germany in great numbers starting from the 1860's usually chose the most famous teachers and the best institutes, and were treated with special consideration. Thus they returned home with an image of research and training practice that was far superior to and far more liberal than what generally prevailed in Germany. These changes carried an important step further what had been begun in Britain. The American departments became even bigger and, more important, lost the hierarchical character so alien to the pursuit of science, for which differences in rank are completely irrelevant.

Furthermore, this structure made possible the differentiation of the teaching and training functions which was implied but not formally recognized in some European academic practice. Undergraduate, professional and graduate research training and degrees were separated and purposefully organised, with more success—it seems—on the professional and graduate than on the undergraduate level. The extended department charged with graduate training made possible a better integration of teaching and research. Finally, the need to find and extend the market for the services of the university brought about a rapid diversification of subjects studied and investigated. This was accompanied by constant changes of the internal structure of the university, such as the establishment of a variety of inter-departmental research institutes and training committees, professional schools and many other activities.

Ben-David's recommendations assume an hierarchic fragmented type of organization based upon the "discipline", a "discipline" being represented by a single professor who was supposed to master it. On the research side, he assumes that the research institutes attached to the university are cast in the European mould being "carefully subordinated in prestige and power to the corporation of university professors, representing the traditional disciplines".

Throughout his book Ben-David stresses the need for European universities to move closer to the large flexible departmental type organization existing in the United States (and incidentally Ontario) and it is against this background that his recommendations must be viewed. In describing the European university he states:

> The problem of the European university is that it is unable to make policy and, in particular, to show enterprise and to experiment in new fields and new ways of research and training organization, since the policy-making function is either vested in a department of the government, or other central body, responsible for all the universities within the country, or the university is self-governing in the medieval sense, headed by elected executives with short-term tenure and no authority to initiate change.

Academic departments in the United States (and Ontario), by virtue of their organization and method of financing, possess far more flexibility to allocate research funds to those areas where they are best employed and it is precisely this objective which Ben-David's recommendations are meant to attain.

But what is most irresponsible about taking Ben-David out of context is that his recommendations are designed to be applied as part of a *national* policy. In one of the paragraphs immediately following the quotation cited by the Wright Commission and referring to his own recommendations he says:

> The effects of such internal reforms would however be limited in Western Europe for a number of reasons. The relatively small size of the countries may make it difficult to establish meaningful competition in any one country, especially where traditions support a hierarchic elite structure. In addition, relatively small size reduces the chances of finding application for science, simply because of the limitations of the economy.

To try to apply these ideas to Ontario while completely neglecting the rest of Canada would be sheer folly! So, Ben-David's recommendations were meant to correct a specific kind of inefficiency in a European context. Is it appropriate to extend this kind of specific correction to a system which does not have the same characteristics and to neglect the national picture entirely?

In Canada, research flows into universities from two principal sources: (1) sponsored research via NRC, MRC, Canada Council, etc., grants to researchers and (2) operating funds, a portion of which is allocated to university research indirectly through salary payments to professors. The last of Ben-David's recommendations cited above would seem to be satisfied, at least in part, by sponsored research funds flowing to individual researchers and/or groups of researchers as grants for specific projects.

The second of his recommendations is the most difficult to implement. Presuming that a satisfactory method for arriving at a proper research and instruction division could be applied, there would be the problem of developing criteria for grading departments and individuals on a composite scale such as publications, overall excellence of members, and contribution to training researchers. It sounds good in principle but agreement on the criteria would be almost impossible to attain. Is it realistic to suppose that international panels of judges could develop these criteria which would be acceptable to the disciplines involved? We doubt it. Moreover, we wonder if the commission members gave any thought whatsoever to the inevitable bureaucratic machinery and paperwork empire that would result from the necessity to call for, review and judge proposals and supplementary information, distribute funds, track progress, etc.

We are disturbed also by the all-too-real vision of professors allocating scarce time to responding to the bureaucratic imperatives rather than to students. And we are particularly afraid, as we shall show later, that they would be chasing after a rapidly diminishing supply of funds.

The implications of the model in Appendix E

Nowhere in the Draft Report is the case really made that funding of research and instruction should be separated. There is much to disagree with in the model of Appendix

E even beyond the arbitrary separation of funds for research and instruction. What are the sources of information on average student and faculty contact hours scheduled per week? Are non-scheduled tutorials included? How valid are the assumptions about percent faculty salaries and average salaries by discipline group? How were the average section sizes formulated?

Despite our strong reservations it is instructive to examine the proposal and to extend the analysis for its implications for Ontario universities.

Appendix E describes a simple algebraic model accompanied by heavily subscripted notations. The model is simply,

$$\text{Income per Student} = \frac{\text{Average salary} \times \text{Average student contact hours}}{\text{Average class size} \times \text{\% faculty salaries} \times \text{average faculty contact hours}}$$

An attempt is made to provide approximate current values for the variables thus yielding Table E-2. Average faculty contact hours is then *arbitrarily* increased from 9.6 in the case of general arts and science to 13.0 with other values held constant. Table E-3 results from this operation.

Thus,

$$\frac{\$13{,}200 \times 20}{37 \times .45 \times 13} = \$1{,}218$$

The student faculty ratio is equal to

$$\frac{\text{average class size} \times \text{average faculty contact hours}}{\text{average student contact hours}}$$

Thus, for general arts and science in Table E-2

$$\frac{37 \times 9.6}{20} = 17.8$$

and for Table E-3

$$\frac{37 \times 13}{20} = 24$$

The footnote of Table E-3 is especially ominous. It says that "13 hours contact at average 1 hour contact plus 2 hours preparation results in 39-hour work week". A 13-hour teaching load yielding a student faculty ratio of 24 is thus arbitrarily derived. The implication of this is that the teaching function in university is less demanding than in secondary schools. (The student/staff ratio in secondary schools is about 17 vs the proposed ratio of 24 for general arts and science in university.) It is stated that the model is hypothetical. Hypothetical or not the message comes through loud and clear. Ontario universities would become basically teaching colleges with add-on resources for research *provided the research could be justified to government.*

The analysis proceeds by assuming standards of average faculty contact hours per week for *teaching only* for each of 5 undergraduate and 3 graduate enrolment categories attributing the difference between these and the existing averages to "research". The existing formula incomes per student and the formula weights for each category are then adjusted downward in proportion to the ratio of the existing averages and the "hypothetical" averages of faculty contact hours scheduled per week.

One weakness in the procedure is that the division of scheduled professorial time is applied only to formula operating income; the remainder of university operating income is simply ignored. Present averages of scheduled professorial time employed in the analysis are necessarily affected by the existence and size of the sponsored research budget. Experience suggests that large sponsored research budgets exert downward pressures on scheduled faculty contact hours per week for those faculty members affected. In this regard it might be noted that in 1970-71 sponsored research represented about 11% of total operating revenues of the 14 provincially-assisted universities in Ontario.

Moreover, the methodology involved assumes that there are only two categories of professorial time, i.e., instruction and research. In fact, numerous studies have been performed to profile professorial time and although they often employ different numbers of activities, such studies show that at least four major categories of activity may be distinguished: instruction (scheduled classes, preparation time, unscheduled tutorials, review sessions, thesis supervision and student counselling); research, including scholarly activities and other study; administration; and professional activities. These studies suggest that during the normal academic session about 40% of professorial time is devoted to instruction, about 35% to research, about 20% to administration and 5% to professional activities. But the model has the effect of attributing all professorial time which is not spent in instruction to research.

Even if it were valid to ignore sponsored research entirely on the assumption that faculty engaged in such research are not included in the computation of the average faculty contact hours scheduled per week, which is not the case, there remains the problem of allocating indirect costs. Non-formula operating funds (excluding tuition fees, formula, and sponsored research) represented some 20% of total operating revenue in 1970-71; these funds are expended on direct instructional activities and indirectly on *both* instructional and research activities. Thus, the model implicitly assumes that there are no indirect costs associated with research activities or that if there are they are distributed proportionally.

One other implication of the model should also be noted. The model assumes that the proportions of graduate instruction and research in the third term are similar to the proportions in the first two terms. The error so introduced may be significant for the master's level students, although the effect for doctoral level students is probably negligible.

Better understanding of the model may be obtained by deriving the implied research component of the present operating grants formula and indicating for each category the research percentage (excluding sponsored research) of the operating funds implicitly assumed by the analysis. Formula income generated for instruction (Table E-3) plus that generated for research is equal to formula income presently generated (Table E-2). Figure 1 contains these comparisons with research values for formula weights, contact hours for instruction and derived equivalencies for research, implicit research for each category and in the last column, implicit research percentage in each category weighted by the number of FTE students in the corresponding category. The implications of the proposed instructional weights are shown in the last column. It is implied that 47% of all research funds are now allocated to research under the General Arts and Science category. Would it be appropriate to distribute 47% of total research funds to support of general arts and science programmes? This only increases our doubts about the validity of the method employed to derive instructional weights by splitting instruction and research funds.

It is useful to look at the results of the application of Table E-3 on page 112 of the Draft Report. Table E-3 is a hypothetical cost allocation *for educational services only* with an assumed research portion removed. We don't agree with the arbitrary assignment of 31% of operating funds to research for reasons cited earlier. It is instructive however to see the implications of applying instructional weights in Table E-3 to derive implicit research funds to universities.

As an example, using the methodology of Appendix E, we have roughly allocated operating revenues between the instruction and research functions for each university.

We have applied the adjusted formula weights derived in Table E-3 to the corresponding programme categories to give approximations of the basic operating income that would have been allocated to Instruction in 1970-71 if the suggested breakdown were in effect.

For undergraduate programmes the adjusted weights were applied to the number of basic income units (including FTE of part-time) generated by each undergraduate programme for each university in 1970-71 to give the number of undergraduate instructional basic income units. Undergraduate basic operating income due to "instruction" was then obtained by multiplying by the value of the basic income unit, in this case $1,650.

For determination of income from graduate students data limitations required that we apply an average weight of 1.85 for both MA's and MSc's instead of the 1.7 and 2.0 derived in Appendix E. It was assumed that the distribution of graduate enrolment between master's and doc-

FIGURE 1

CATEGORY DATA DERIVED BY APPLICATION OF HYPOTHETICAL WEIGHTS OF TABLE E-3

Enrolment Category	Present Weight	Instructional Weight (from Table E-3)	Derived Research Weight	Present faculty contact hours for instruction and research	Proposed faculty contact hours for instruction	Implicit equivalent contact hours for research	Implicit research %	% of students in category	Research funds proportioned by category	Total implicit research funds 1970-71
	(1)	(2)	(3) (1)-(2)	(4)	(5)	(6) (5)-(4)	(7) (6)/(5)	(8)	(9) (7) (8) Σ[(7) (8)]	(10) (Σ10) x (9)
General Arts & Science	1.0	0.75	0.25	9.6	13.0	3.4	26	51.3	47%	$ 49.3m
Honours Arts, Commerce, Law, etc.	1.5	0.9	0.6	8.1	13.0	4.9	38	17.2	23%	$ 24.1m
Engineering, Architecture, etc.	2.0	1.5	0.5	13.9	18.0	4.1	23	18.3	15%	$ 15.8m
Med.—Basic	5.0	2.3	2.7	6.0	16.0	10.0	62	1.9	4%	$ 4.2m
Med.—Clinic	5.0	2.7	2.3	7.0	16.0	9.0	56			
M.A., M.B.A.	2.0	1.7	0.3	10.8	13.0	2.2	17	9.4	7%	$ 7.4m
M.Sc.	2.7	2.0	0.7	9.6	13.0	3.4	26			
Ph.D.	4.0	1.7	2.3	5.6	13.0	7.4	57	1.8	4%	$ 4.2m
										$105.0m

toral students in 1970-71 was approximately that of graduate degrees granted in 1969-70. The basic income units generated by graduate enrolment in each university in 1970-71 (including FTE of part-time) was then split into master's and doctoral components by regarding the doctoral weight to be approximately twice that of the master's. As before, the basic operating income for graduate instruction was obtained by multiplying the "instructional" basic income units by the value of the basic income unit. The assumption that the instructional and research components during the third term are similar to those during the first two terms is implied in the procedure adopted. Thus, to the extent that master's level students engage in a disproportionate amount of "research" during the third term, the research component of basic operating income will be understated and the instructional component overstated.

Adding the undergraduate and graduate "instructional" components yielded the total "instructional" basic operating income while subtraction from total undergraduate and graduate operating income gave the undergraduate, graduate and total "research" components of basic operating income. The percentage distributions between universities of instructional operating income and the research component of operating income are shown in Figure 2. The implicit distribution of instruction and research among the institutions is noteworthy as is the total size of the research component, about $105 million.

We now ask some very important questions. First, is there not a great danger that as funds become tighter and tighter the total research portion to the system will shrink because it is much more related to long-term social return than short-term social demand? Ben-David might regard such a possibility with horror since he notes that the definition of higher education and research,

> ... makes it clear why higher education cannot be treated apart from fundamental research. Students, like the mature members of the scientific community, are consumers of new knowledge, and university teaching is but one way of communicating the results of scientific research. It is true that only a small minority of students intend to become scientists, and that much of the teaching at universities is but drilling-in of existing knowledge. But what distinguishes higher from other types of education is the intention of the students to apprentice themselves, at least temporarily, to members of the scientific community; and adequate, as distinguished from inadequate, university teaching emphasises the creation and communication of new knowledge, and treats the body of established science as a background to creative research.
>
> The overwhelming degree of overlap between fundamental research and higher education can also be presented from the other angle. Every research project which leads to original results involves the training or re-training of people. Even if this is not defined as an explicit aim of the research it is one of its principal effects. After all, what is the communication of newly created knowledge in speech and writing if not re-education? Higher education and fundamental research are therefore logically part of a single co-ordinated endeavour the aim of which is the creation and diffusion of new knowledge, first and foremost to a specialized scientific community and those apprenticing themselves to this community and only secondarily to an undefined general public. The separation between higher education and research, which is the rule in some countries but not in others is ... the result of institutional circumstances that have nothing to do with the inherent nature of these activities. As a matter of fact, even in those countries where institutions of higher education and research are separated, the personnel who perform the two functions are to a large extent identical.

If education and research are separated for funding purposes governments will find it impossible to resist placing the emphasis on educational outputs (students educated, degrees produced, etc.) at the expense of "unimportant" research. Further, is it realistic to suppose that a better, more acceptable system of distributing research funds among the institutions could be developed than that already provided by the operating grants formula? Without actually measuring numbers of contributions to scholarly publications, patents, breakthroughs in research, etc., we suspect that the distribution of research funds among the institutions would not be too different. Why then provide a temptation for governments to convert universities into community colleges by shrinking research for the dubious returns resulting from a slightly different distribution of university research funds?

FIGURE 2

DISTRIBUTION OF INSTRUCTION AND RESEARCH FUNDS TO UNIVERSITIES BY APPLICATION OF HYPOTHETICAL INSTRUCTIONAL WEIGHTS OF TABLE E-3

University	Basic Operating Income attributed to instruction ($000)	%	Basic Operating Income attributed to research ($000)	%
Brock	3,656	1.5	1,386	1.3
Carleton	16,480	6.9	6,079	5.8
Guelph	12,511	5.3	9,077	8.6
Lakehead	4,249	1.8	1,631	1.6
Laurentian	4,671	2.0	1,850	1.8
McMaster	18,138	7.6	8,013	7.6
Ottawa	17,744	7.4	8,372	8.0
Queen's	18,393	7.7	8,012	7.6
Toronto	58,006	24.3	25,288	24.0
Trent	2,715	1.1	1,141	1.1
Waterloo	23,894	10.0	9,435	9.0
Western	25,638	10.7	11,309	10.7
Windsor	11,728	4.9	4,904	4.7
York	20,846	8.7	8,697	8.3
TOTAL	238,669	100.0	105,194	100.0

COMMITTEE ON CAPITAL FINANCING

Recommendation 16

The lack of an "emergence" space allowance under the capital formula for new satellite institutions would inevitably restrict the institutions' ability to offer a wide range of courses. It would also be difficult to provide the cultural, athletic and semi-social activities which Recommendation 70 suggests should be available at all post-secondary institutions.

Recommendation 19

Small colleges of 200 to 1,000 students without research programmes would undoubtedly be less expensive as would any institution offering a restricted and relatively simple programme. It is recognized that the suggestion that rental space be used and operating funds be provided is a statement of principle. It might be noted that at the current debenture rate of 7% the resultant operating grants would not cover the rental costs.

Recommendation 49

It is reasonable to fund all post-secondary education through a single government department, provided

(i) that it is recognized that institutions may have different purposes and goals and that funding at varying levels will be needed, and

(ii) that it is recognized that other government departments may have a vital interest in some programmes (e.g. forestry, medicine, agriculture) and may wish to have extraordinary programmes initiated at costs which may fall outside normal financing.

Recommendation 52

Capital financing under an objective formula is acceptable having in mind the comments in respect of Recommendation 49. The need is not for open meetings to justify major changes in the formula but consultation with those institutions which will be affected by the changes and careful prior examination of the probable results of the changes. Consideration may have to be given to allowing time and to providing additional funding to allow universities to react to changes in the formula.

Recommendation 70

See comments under Recommendation 16.

Recommendation 71

The Committee on Capital Financing has already expressed some reservations about the combining of operating and capital grants. It recommended that a final approved capital formula be developed and tested in practise for a minimum of two years prior to the implementation, if any, of a combined formula. It further recommended that a special study group should explore the benefits and disadvantages of combining the formulae—such study to include funding practises as between capital and operating in other university systems, in government, and in large private and public corporate structures. The Committee feels that these earlier recommendations are still valid.

Recommendation 72

The current method of producing a schedule of capital entitlement over a five-year period is essential as a planning tool. Announcement of a schedule of available capital on a rolling three-year basis would also be helpful, particularly when available funding will be less than entitlement.

COMMITTEE ON STUDENT AID

Accessibility

Any discussion of accessibility to post-secondary education must necessarily address itself to the reasons for which people seek entry. We know that an individual's demand for post-secondary education depends on many factors, notably:

(a) the characteristics of the program in terms of
  (i) the type of curriculum,
  (ii) probable financial returns,
  (ii) tuition fees,
  (iv) geographic spread;
(b) The attributes of the individual in terms of
  (i) attitudes to post-secondary education,

(ii) capabilities,
(iii) family position including income or wealth,
(iv) resources available,
(v) number of dependents in the family.

Educational policy, including the mode of financing, can affect only certain of these elements but it is clear that *all* of them must be taken into account in designing such policies.

If we want to design educational policy with an eye to changing accessibility characteristics, we must first of all explicitly define the goal. We must then estimate the degree to which various policy mixes would move the system towards the goal. The Commission takes accessibility to mean "mainly but not exclusively, the provision of increased post-secondary opportunities for students from lower-income groups, for adult students and for part-time students." We find this definition extremely vague and rather unhelpful. It might mean one or more of the following three things:

(a) offering these particular students an opportunity which they are now denied;
(b) actually enrolling larger numbers of such students;
(c) raising the proportion of such students in the total student body.

Any one of the above definitions does not necessarily imply the other. However, the Commission appears to believe that its policy proposals will effect increased accessibility whichever definition is used.

The Commission recognizes the importance of monitoring the effects their suggested measures will have on accessibility to post-secondary education (Recommendation 65). In light of this we are astonished that:

(a) the Commission does not set forth any operational criteria for monitoring student aid or student financing schemes;
(b) the Commission has made no attempt to evaluate the Ontario Student Awards Program (OSAP);
(c) the Commission has not appraised its own suggestions in terms of any criteria whatever.

We are concerned that the Commission seems to have dismissed out of hand the existing student aid program, a program that in our opinion has made post-secondary education more accessible[1]. One of the main concerns expressed in recent government-sponsored studies has been the rapid escalation in the costs of post-secondary education; we are now asked to accept on faith a new student aid scheme of unknown benefit and unspecified cost.

The Commission perhaps does not recognize clearly enough that Ontario universities have always been committed to universal accessibility in some sense. Neither truth nor history is well-served by applying the "elitist" label to the universities. Every effort is made to provide places for all qualified students. Fees have been maintained at a relatively low rate, even in the days when little or no government funding was available. Few of the universities' programs have fixed or limited enrolments. As far as their own funds have allowed and bearing in mind the restrictions on basic income units, the universities of Ontario have tried to help students from lower-income backgrounds. In 1965 the universities recommended individual awards to students and thereafter welcomed the establishment of OSAP (1966) which began to help needy students on a more appropriate scale. We are relieved to see that the Commission wants such aid to continue.

We would also point out that more recently the universities have suggested[2] to the government (and, in fact, to the Commission) that apart from providing grants for entrance into universities it is just as important to provide the necessary incentives and encouragement to students with low socio-economic backgrounds at the elementary and secondary levels to continue their education at the tertiary level. It is disappointing that the Commission, while conceding the value of deploying funds at this earlier stage, has not made any specific recommendations. . . .

The Commission is surely incorrect in implying that post-secondary education has become universal and in suggesting naively that only some sort of irrational social pressure keeps people continuously in school. As real income rises, parents and students are more able to bear the private costs of extended study; further they are more eager to buy the consumption benefits of higher education. Since real incomes will continue to rise, we must expect more and more people to opt for longer and longer periods of sequential education. Admittedly, as the highly educated become relatively more plentiful, they may get a smaller payoff from university study. Full-time sequential attendance would then grow less rapidly than if private payoffs had remained high. In the United States, enrolments and retention rates have continued to rise, even though expected returns have probably dropped. This experience is relevant to the Canadian situation, for it suggests that increasing wealth, not irrational society, is one of the important determinants of the demand for full-time sequential university study. . . .

The above considerations are relevant to the Commission's geographical approach to accessibility. According to the recommendations, campuses are to be scattered more widely around the province and aid schemes are to discriminate in favor of the stay-at-home student. But we cannot believe that the Province will really make all or most programs available in all or most places. If we want to give every student a crack at all opportunities, we must

[1] *Accessibility and Student Aid*, Council of Ontario Universities Committee on Student Aid, Toronto, 1971, Chapter II.

[2] *Ibid.* p. 52.

ensure that he has the resources to go where the opportunities are to be found; we cannot try to move all the opportunities to the student. The Commission's proposals are thus likely to prove to be an extremely expensive and inefficient way to increase accessibility..

The Commission's Proposed Student Aid Plan

Tuition fees and loans

The Commission recommends substantial increases in student fees. We are not necessarily opposed to some increase in tuition fees. However, we are quite unconvinced of the methodology suggested by the Commission for separating instructional costs from research expenditures. And we seriously question the rationale used by the Commission in arriving at the 50% figure of instructional costs for the student's contribution. The latter was apparently adopted on the basis "of 'test-runs' of various schemes and extensive discussions". To further support their decision the Commissioners quote two advantages: "it makes it clear to the student that for each dollar he pays towards his education, the public also contributes one dollar; and it leaves the current level of fees for many students relatively undisturbed". The former is nonsense and the latter is simply not true. The Commission recommends that fees should be increased by 30% at one end for students in General Arts and Science and by over 200% at the other end for graduate students. One should also bear in mind the Commission's Recommendation 62 (urging that "institutions should be free to set their own tuition fees") which could lead to further increases.

Our Committee wishes to emphasize that it considers the matter of distribution of costs to be a vital issue and has already indicated* this to the Commission. Yet, the Commission's Draft Report provides little help in evaluating the proposed distribution of costs between society and the student. One notes with dismay that the discussion of post-secondary costs is almost entirely oriented toward the public budgetary (as opposed to private) costs involved. The question of foregone earnings is virtually ignored. It is impossible to comment more specifically on this very crucial point unless some documentation is available to indicate how the Commission arrived at this figure.

One implication of the Commission's proposed scheme, however, seems clear. There is fragmentary but accumulating evidence that an increase in the private financial costs of education such as those proposed by the Commission will decrease the number that apply for admission. The Commission feels that by offering loans to all segments of the population regardless of income, it can offset the downward effect such fee increases will have on enrolments**. However, if the Commission's loan scheme is to charge interest at the commercial rate in order to avoid abuses by "unscrupulous people" (as is suggested on page 48), the scheme will do nothing to ease the added burden of higher education for the large majority of student families. Most parents of university-age children are already close to their peak earnings. They have access to credit, and most have experience in borrowing and in repaying. The Commission's loan scheme which provides loans at commercial rates will thus offer nothing to these families that they do not already have. Other things being equal, there is no reason to believe that the proposed loan scheme (if it is to charge interest at commercial rates) can offset the inevitably downward pressure that tuition fee increases will have on university enrolments. . . .

If we assume the Commission intends the "income" loan scheme to be self-supporting, the interest rate (not specified) and the repayment period (15 years is suggested but not substantiated) must be carefully selected if "good" risks are to be attracted into participating in the scheme. Failure to do so could, in the Committee's opinion, have the following unfortunate ramifications:

(i) "good" risks (students from well-to-do families and students anticipating high payoffs) might well be tempted to finance their education outside the scheme:

(ii) the most likely participants in the loan scheme would be the "bad" financial risks—namely, women (because of the generous treatment afforded to married women) and other students anticipating a low payoff;

(iii) such developments might necessitate the infusion of a substantial public subsidy or an increase in the interest rate and repayment period to make the scheme self-supporting. The latter would make these loans even less attractive to the "good" risks.

This underlines a point which this Committee has long

*For example, Recommendation 8 in *Accessibility and Student Aid* reads: That post-secondary institutions and provincial officials undertake to compute the annual *per capita* cost of educating a student at the post-secondary level;
a) that in doing so they commit themselves to reaching agreement on:
(i) the issue of foregone earnings,
(ii) the amortization of capital costs.
That this *per capita* cost be made explicit and debate be invited from all those affected to consider the most desirable allocation of this cost between the public and private sectors.
That alternative student aid schemes be evaluated in their total context with central reference to the distribution of costs and the promotion of accessibility.

**Grants are also to be made available for prospective students whose parents are in the lowest quartile of income earners. However, as will be pointed out, only a small proportion of the total student body will be enrolled at University as a result of the incentives provided through these grants.

emphasized[1], namely that great care must be exercised in setting the interest rate and repayment period.

In order to reduce the personal risks of investing in education, the Committee proposes that repayments should be made by the individual according to the size of his income. In support of its proposal, the Commission suggests that the only major argument against the use of contingency repayment schemes has been the prospect of having too many women default on loans due to marriage. That the Commission has ignored other major difficulties is one thing, but to make such a statement indicates a degree of irresponsibility. The Commission claims that its student-loan proposal differs from most in that (a) it would make loans available to women under the same conditions as for men (CSLP does this) and (b) if, as a result of marriage, a woman could not repay the loan, it would not be shifted to her husband. One would take (a) for granted but (b) still treats women separately and raises some questions. A man and woman living together, both of whom are wage-earners, would each have to pay back loans separately, whereas by being officially married only one loan would have to be repaid. The scheme therefore provides a strong monetary incentive to marriage. Is this the kind of social policy that the Commission wants? Why not make both parties responsible for their loans, regardless of whether they are married or not? Surely this would be more in keeping with equal status for women.

Some members of the Committee have come to have *general* reservations about income-related loan repayment schemes. It seems likely that the groups which do not repay their loans will consist very largely of *public* employees—elementary teachers, nurses, librarians and such occupations. By forgiving their loans, the loan-scheme has the effect of raising the net incomes of these workers. That is, it reduces the gross incomes which the government must offer to fill these jobs. It is not obvious that a government is acting wisely by creating such a loan-scheme—one which subsidizes its own employees. Such a scheme reduces the government's wage bill at the cost of the other participants in the loan plan—or, if the budget subsidizes the plan, at the cost of society at large.

Similar considerations apply to the Commission's contract labor proposals (Recommendation 67). Almost all the relevant occupations—teachers, nurses, doctors, dentists, municipal officials—are in the public service or very close to it. Why should the government not simply offer higher salaries in the disadvantaged areas? In effect, the Commission is recommending that the government should offer free education to those for whom it would *otherwise* have to find larger wages. But if the term of indenture is short, the benefit—from lower wages—could easily be smaller than the cost in student aid. And if the term is long, the problems are endless. The government will predictably be faced with the problem of "fugitive serfs". Will it drag them back through court action? And what sort of public service might we expect from such unwilling people? Further, there is a risk of abuse. One can imagine an ever-lengthening list of "social occupations" and "special locations" where this sort of indentured labor would keep wages down.

While the Commission may of necessity have had to omit some of the administrative details of the "income" loan scheme, it is our opinion that it was negligent in not addressing itself to the administrative problems of securing and enforcing repayment. Bearing in mind that the Draft Report makes no mention of integration of the loan portion of its proposed student aid plan with a national scheme (current CSLP or projected), the problem of interprovincial and international emigration may become most troublesome. Certainly this point warrants some attention from the Commission.

Grants

The last element in the Commission's package and the most obviously related to student aid is the grant proposal. We have three very pressing questions about the grant scheme which the Draft Report does not answer:

(a) What will be the amount of the maintenance portion of the grant? (Incidentally, Figure IV—1 of the Draft Report is drawn to indicate that these maintenance grants will be non-existent).

(b) How many students may be expected to receive these grants?

(c) What will the province be expected to spend?

In many instances, the Commission has been very specific in its use of figures to illustrate the implications of some of its proposals. However, no representative amount is mentioned in the case of the maintenance portion of grants for students who would qualify. Should the amounts involved be unrealistic, the purpose of these grants to enhance accessibility would be seriously undermined. On the other hand, it would appear that the amount of grant would not be based on some expected contribution (as is now the case with OSAP) from parents. Some clarification of these points would certainly be helpful.

In the form which the Commission has designed its grant scheme, there will be very few prospective students who will be eligible for full maintenance. As already mentioned, the parents of university-age children are approaching peak earnings: few are in the lowest quartile of *all* income earners, this latter group being made up largely of new entrants to the labor market and the old. As a result, there can be few people who qualify for full support. We wonder whether the Commission realized this

[1] *Ibid.*, p. 89.

implication. It may well be more appropriate to use the median of the income distribution of families which are likely to have children of post-secondary education age.

Under the proposed system of eligibility, a student from a family in the lowest quartile of the income distribution would be entitled to a full tuition-maintenance grant for possibly three years. If the student comes from the top half of the family income distribution, he would get no grant. The Commission reports that the critical points of the family income scale could be $7500 and $10,000 per year. The Commission has apparently not noticed that this scheme creates enormous work disincentives for families in and near the second quartile, and for their children. If the maintenance grant is provided on a scale sufficient to cover tuition fees plus a significant portion of the student's out-of-pocket expenses, it may even pay families with two or more children at university and an income between $5000 and $10,000 to deliberately reduce its income from work. The increased grant it would thus draw would more than compensate for the reduction in work income. Such problems have become familiar in the literature of welfare programs, and have been extensively discussed in connection with the negative income tax. These difficulties occur because the grant is large relative to the income range over which it must taper from full-maintenance to zero. They can be eliminated by widening the income range over which this taper occurs, by reducing the full tuition-maintenance grant, or by doing both. It is difficult to understand how the Commission overlooked the matter. On fiscal ground—in terms of provincial expenditures—there is undoubtedly a case for tapering grants,[4] but not in the manner suggested by the Commission. . . .

In designing its student aid scheme, the Commission has perhaps failed to consider the implications of abruptly terminating all grant assistance after three years. Surely there is now enough accumulated evidence that low-income families are more reluctant to incur debt for educational purposes than are their richer counterparts. It seems virtually certain that such students who would now qualify for grants under OSAP may well be influenced in their choice of program or of institution under such an arrangement. In our opinion there is already an unacceptable degree of underrepresentation of students with low socio-economic backgrounds in many of the programs which extend beyond three years* such as medicine, law and graduate studies. The Commission's proposal to cut off all grant assistance from students after three years of study, combined with proportionately substantial increases in tuition fees, will almost certainly lead to a significant worsening in the underrepresentation of low-income students in these key programs. Such a development would be highly retrograde and makes nonsense of the Commission's claim that its proposals would lead to an increase in accessibility.

[4] *Ibid.*, Recommendation 12, p. 104.

Summary

In summary, we wish to make it clear that the Commission's stated philosophy on accessibility to post-secondary education and flexibility within the system largely reflects views already articulated by the Universities of Ontario in previous submissions to the Commission. . . .

We feel, however, that the Commission's zeal to promote certain other ideas (e.g. distribution of financial costs, sequential education, etc.) which are not substantiated in any way and which are not always consistent with the principles previously stated, have greatly influenced the recommendations made for the implementation of a new student aid program. In our response to these proposals we have attempted to focus attention where the Commission has not been explicit enough and where the implications of certain of its recommendations seem to dangerously undermine the principle of accessibility or not to take into account certain other criteria of equity or viability.

*In fact, many undergraduate programs involve four years of study. If the Commission wishes to argue for shortening such programs to three years it should do so on academic grounds instead of trying to introduce pressures to do this through its student aid proposals.

COMMITTEE OF FINANCE OFFICERS—UNIVERSITIES OF ONTARIO

Very little hard, financial data is provided, e.g., the source of funding for the actual costs of research, and a long-term assurance of these sources. Significant expansion in the post-secondary education facilities is recommended in #16 and #19. Increases in special grants are included in recommendation #17. However, no costs for these recommendations are included. Cost simulations will be necessary to determine the financial feasibility of these proposals. Page 43 suggests that precision in costs is not necessary. However, from this imprecision the report arrives at rather precise numbers of funding. The report on page 43 also states, "that the analyses in the appendices show it is pos-

sible to identify university research costs and to separate them from direct instructional costs". In fact, the appendices do not show this. Appendix E develops hypothetical instruction values but does not discuss the extraction of the costs for research. . . .

Recommendation 61

There are two possible interpretations of the impact of this recommendation and an examination of Appendix E.

One conclusion is that the mathematical exercise in Appendix E and the resulting conclusions are roughly done to generally justify the proper division of instructional costs between the student and the public. There is an indication of approximately one-third of university resources to come from each of student tuition fees, Provincial Government subsidy for instructional costs, and income for research costs. It is assumed that the effect of this is that approximately one-third of a university's income will be derived from student tuition fees and about two-thirds from the Provincial Government, and that this exercise is intended only to determine the source of income in this fashion. If this is so, we have no other comment.

The second possible interpretation of this recommendation is that there are three distinct sources of university income in which student tuition fees represent approximately one-third, Provincial subsidy for instructional costs represents about one-third, and research grants represent about one-third. However, in this case research grants are not an automatic Provincial funding as assumed above. In this event we have the following comments:

(a) Would the provision of research funds be at the discretion of a wide variety of Federal and Provincial Government departments? How would continuity be assured? Can government departments assure the provision of research funds over a five or ten year period? If, as indicated in the commentary on page 45—all salaries and overhead costs would be included in costs of research—would one thus assume that all research would carry such overheads and be provided by the granting body, Federal or Provincial? How would the universities be assured of the continuity for on-going overhead requirements if the basic research grants themselves are variable from year to year? The physical plant has been developed on the total programme of the university including research. There are on-going commitments of cleaning, heating, etc., the costs of which will have to be met regardless of whether research grants exist or not. How will capital funds for future plant provisions for research be provided from research sources?

(b) How would research money be allocated to institutions? Would it be the sum of individual faculty member awards? The effect of this would be that each faculty member would have to generate research grants of about one-third of his salary, benefit, and overhead costs. How would new, young faculty members generate such research grants? How and by whom would the over-all research performance of the institutions be determined, converted to dollars, guaranteed over a period of time?

(c) The short-term or immediate benefits for research are often difficult to recognize. In times of financial constraint, is research support likely to be cut because it would be construed as secondary to educational costs?

(d) How would this change affect the existing 50% contribution to higher education costs made by the Federal Government if the Federal Government is asked to provide overhead on research grants in the future? . . .

Recommendation 64

The cut-off at $10,000 between the second and third quartile is too rigid a division. This problem was recognized by the Federal Government when it wished to change the family allowance programme. Provision would have to be included for the situation wherein there are two or more children in a family attending university concurrently. It is assumed that in such a case different criteria would apply. It is suggested that a sliding scale of some kind would be appropriate.

It is agreed that it would not be reasonable to include the debt incurred by a woman with the debt of her husband and require that such debt be repaid by the husband. It is suggested that women, and perhaps also those who move out of Canada for part of their careers, should be required to repay their loans in the first fifteen years that they may be working and earning a taxable income in Canada. Such a time span may be broken by not living in the country or by being out of the workforce to raise a family. However, it is expected that in many cases, for example married women with University degrees, when they do return to the working force, will be in professional positions with the expectation of above-average earnings, and in such cases it would not be unreasonable that they should repay the loan based on their own earnings.

It is suggested that there should be an upper limit to the amount that an individual can borrow as a student. The scheme should not encourage the role of the "professional student" to continue indefinitely. . . .

Recommendation 71

Can the public source of funds for capital works at universities (in both the original form of new buildings, furniture and equipment and in the preservation of such assets through alteration and maintenance projects) be allocated to universities in a lump sum formula to provide for both operating and capital? It is very difficult to react to a proposal such as this without a concrete formula to consider. It is our view, however, that the Department of Colleges and Universities has to have an over-view of the capital projects planned by universities in terms of their relationship to other projects and programmes within the total Provincial system. A combined grant would obscure this over-view.

A unified formula encompassing operating and capital programmes may result in decreased capital spending and increased operating spending with the obvious results. It is very difficult, within an institution, to resist the short-term needs for items such as salaries and books for longer-term needs for plant maintenance and replacement.

In the past the operating formula has been based upon the number of students attending an institution each year. The capital formula has been based upon only the increase in the number of students from one year to the next attending an institution. The funding of operating costs has been from current provincial sources and capital costs from long-term, thirty-year debt. These differences in bases make it difficult to understand how one grant base or formula could be developed to provide for the same considerations.

Generally speaking, capital grants are not dealt with in the draft report. Specifically, space for research is not considered or referred to. What would be the source of funding for future research space? It is questioned that one can separate funding of the operating portion of research costs without considering the impact on the capital side of the problem. . . .

ONTARIO UNIVERSITIES' TELEVISION COUNCIL

Members of the Committee agreed that Recommendation 21, on establishing a "University of Ontario", was pivotal; and they devoted a major portion of the time available to a consideration of its implications. Here are some of the points raised:

1. We believe that a University of Ontario can fill a definite and growing need in this province, in terms of making university level courses more accessible and transferable, and by serving as a coordinating agency.
2. The University of Ontario's evaluative testing role raised two reactions:
   (i) the relationship of the secondary school system and its standards to higher education should be explored further;
   (ii) in some respects other than geographical we already have an Open University system. We therefore hope that the Open University concept as proposed does not follow too closely the model of the British Open University. Rather we should build an institution which meets Ontario's needs.
3. Since we consider that one of the primary roles of the University of Ontario should be that of a coordinating and delivering agency, its relationship to other institutions needs to be defined. Such institutions include the proposed Centre for Instructional Development, OISE and OECA, as well as the existing universities.
4. We feel that among the public and some of our academic colleagues as well, the University of Ontario may become the main focus of innovative academic programs. Certainly its role in providing models of teaching/learning practices can have a beneficial effect in the established universities. But we believe that the established universities also can and should initiate innovations. We commend the Commission for proposing incentives (in Recommendation 52) through setting aside 5% of the Board's operating budget for this purpose.
5. The coordinating function of the University of Ontario is a critical one. Committee members expressed the hope that the resources of the University of Ontario be coordinated with those of the existing universities. (Some examples:)
   (i) avoiding the duplication of a course in an area where this is already offered by a local university;
   (ii) making available course materials, testing and evaluating instruments, etc. to established universities on request;
   (iii) facilitating an accommodation between the existing universities and the University of Ontario in establishing both teaching and other academic criteria.
6. The roles of part-time instructional agencies of the existing universities were brought into question.

ONTARIO COUNCIL OF UNIVERSITY HEALTH SCIENCES

The pluralistic approach to qualifying for admission into health profession programs has been evolving, and is desirable, but at some point the knowledge and abilities of the student must be assessed in terms of his or her competence to proceed to a given objective such as dentist, nurse, physician, etc. Assessment as a requirement for admission to a professional program, should be continued. There should be standardisation of admission requirements to a given professional program. Continuation in a professional program on a part time basis has limited application, but may be possible for part of a program except in medicine and dentistry where it is not possible. For example it is already in effect in nursing to a limited degree. To take a program on an intermittent basis is however possible, but not desirable, particularly in medicine and dentistry. Within certain limits, the opportunity of taking some courses at one university, and others at another is now possible to a very limited degree, but extension of this is dependent upon developing greater uniformity of professional programs than now exists, an objective of questionable desirability.

To provide opportunities for upgrading, transfer courses to allow change of program should be available, but provision of opportunity for upgrading will have to be related realistically to the numbers of students involved. It should also be pointed out that in ignoring the age of the student, one also ignores the benefit and cost to the state in terms of service to be rendered by the upgraded graduate, particularly if he is middle-aged. Every centre should not provide equal opportunity for transfer and upgrading in every health program. Rather upgrading opportunities should be limited and divided between the various centres. Selection of all candidates for any professional program by lottery would probably lower standards of education, be accompanied by a greater attrition rate in the program, and finally, reduce the output of graduates. The objective of the Universities of the Province should be increased enrolment to meet estimated manpower requirements, at the same time as they undertake experimentation and exploration of how to extend the effectiveness of existing health workers. A spectrum of health professionals might evolve from further research into health care delivery, but at present the trend is toward greater use of personnel trained to a technical level of competence and not towards development of new kinds of skilled professional workers. Within the professions such as dentistry, medicine, nursing, and pharmacy, specialization is increasing, thereby presenting opportunity for diversification and upgrading without embarking on the transition from one profession to another. In general this latter step is made difficult by basic knowledge requirements in science that cannot be replaced by experience. Health professional workers fall into several broad groups, and transition within the group may be relatively easy because of similarity of educational requirements and professional programs, for example physicians-dentists, nurses-therapists.

Continuing education programs for all health professionals are necessary, and need a firm financial basis if they are to be successful. The only health professionals now able to afford to take them are physicians and dentists. Rather than demand complete re-examination of every practitioner every ten years, a most expensive program to operate, it would be preferable to demand attendance at a certain number of continuing education programs on a regular, but intermittent basis, with an examination taken on the continuing education course attended. With the progress of a career, nearly every professional, be it nurse, dentist, physician or pharmacist will develop some activities and drop others. In other words some degree of specialisation and limiting of role is a normal development. Continuing education and maintenance of licensure should give recognition to this fact. With regard to licensure by examination alone, this can be achieved if due recognition is given to examining not only knowledge necessary to achieve professional competence, but also the basic scientific data on which it is based. The skills needed in a given profession must also be examined, but this can be done in a variety of ways.

Financing of students in the manner suggested will still not encourage students in the lower family income groups to enter expensive courses like medicine; the means test begins at too low a level. In fact, a formula to finance students based on a means test is less desirable than demanding repayment later out of career earnings, or by serving in underserviced areas for a specified period of time. . . .

ONTARIO COUNCIL OF UNIVERSITY LIBRARIES

Although many of the recommendations in the draft report of the Wright Commission will have considerable indirect effect on university libraries there is one specific recommendation which enunciates the general principle of the *openness of university libraries!*

> Rec. 18 (p. 23) "All citizens of Ontario should have access to all libraries, including those in provincial educational institutions such as universities, colleges of applied arts and technology, and secondary schools."

We think that as it stands this recommendation is over generalized and must be clarified. All university libraries are already accessible to citizens to a significant degree. The university libraries of Ontario already lend more material through interlibrary loan to other Ontario non-university libraries than they lend amongst themselves. All university libraries permit consultation of their materials, but the more extensive or regular the desire of anyone not a member of the university to use the library the more generally do university libraries exact either some sufficient explanation of a person's need for this service, or require some payment for the service, as for example direct borrowing privileges.

Access to library resources of all types must be taken to mean adequate access to information through effective channels and networks, by which all the resources of the area or the Province are available to all. Only a distorted misconstruction of the phrase could claim that all libraries, including university libraries, should be all things to all men. It is impossible even for a university library to be all things to all the members of its own institutional community. It must strive to reach a level of adequacy for a proper priority of objectives, the first being service to its own student body and staff community. Its support role for the larger community must be at a lower priority, important as it may be.

It has been established by the Research Division of C.O.U. that almost all Ontario University libraries have substantial capital needs for buildings if they are to keep up with even the requirements of the projected number of university students. Present economies forced on universities by less generous operating grants than heretofore are already reflected in the declining purchasing power of library budgets and in poorer services. If there were any substantially greater requirements than at present for university libraries to serve other segments of the population this service would need to be accompanied by commensurate increases in both capital and operating funds. . . .

In particular we should like to reject strongly any suggestion that control or financing of university libraries should be taken away from universities and given to the Coordinating Committee for the Open Sector. We do not think this would be a desirable development in Ontario, where we consider university libraries should remain sensitive to the needs of the universities.

There have already been suggestions that university libraries should serve students of nearby C.A.A.T.S. and receive a fee for service from such institutions. There may be universities where this is feasible and desirable but in general we believe that the C.A.A.T.S. should have adequate libraries of their own. Libraries serving heterogenous groups tend to be less responsive to students. We believe, as the Commission does, that C.A.A.T.S. and universities should offer different courses, and this means that they need different materials and different emphasis in library service. Secondary school students studying part-time at university (Rec. 24) and students taking cross-accredited courses at university institutions already automatically have access to university libraries.

We welcome the statement by the Commission (p. 25) that public and regional library systems will need increased support to serve the needs of students of the University of Ontario. The Commission has aimed (Draft Report, p. 19) towards an eradication of the distinction between "students" and other members of the community. To this end, the general social and cultural functions of the public libraries, to all members of the community, and not solely "to students", formal or informal, should be adequately supported.

The great diversity of personal aims, needs, and aspirations should be served by a diversity of cultural resources through libraries.

ONTARIO UNIVERSITY REGISTRARS' ASSOCIATION

The Draft Report of the Commission on Post-Secondary Education in Ontario is first and foremost a "social" document and it cannot be faulted for its preoccupation with the "social goals" of post-secondary education. In the process, its recommendations fail to spell out in sufficient detail the possible effects of universal accessibility and availability on the quality of education and desire to maintain high standards in post-secondary education, particularly on the University level. While one can only applaud the objective of universal accessibility, one can only remain painfully conscious of the problems which may ensue in terms of the academic and administrative resources necessary to maintain acceptable standards. . . .

"The Commission's failure to grapple with costs is astonishing, for it surely must recognize that it proposes to impose a financial burden of no small proportion on Ontario tax payers. Obviously, the first question must be 'what is the burden?' and secondly 'is it worth it?' The Commission should not submit its report until it has clearly established the estimated costs of individual recommendations and the total cost of all recommendations, including the rather terrifying prospect of extraordinarily high administrative costs.

"The Commission makes a number of recommendations which it fails to support in adequate fashion. One need only look at the first three recommendations to realize the weakness of its position. For example, what evidence has it produced to show that the programs it names in Recommendation 1, do 'benefit society'? In the judgment of many people these programs have a very low 'cost/effectiveness'." . . .

COUNCIL OF DEANS OF ARTS AND SCIENCE OF THE ONTARIO UNIVERSITIES

Accessibility and admissions criteria

Our concern about the extent to which the Draft Report has focused upon universal accessibility without giving due consideration to the character and quality of different types of post-secondary education is illustrated by some of the recommendations in Chapter 3. There the Draft Report appears to have concentrated its attention on accessibility to institutions rather than upon the more fundamental objective of accessibility to knowledge.

We support the social desirability of widespread access to formal and informal post-secondary education suggested in recommendations 2 and 7, but neither recommendation makes any effort to relate this to the nature of education that may be appropriate for the individual. In the case of universities, for example, financial, social and institutional limitations on accessibility are clearly undesirable, but university programmes of any quality must presuppose intellectual aptitudes and achievement. Recommendation 7 makes no reference to rational admissions criteria which might be developed to relate admission to particular streams of post-secondary education to the capacity of the individual to benefit and profit from a particular form of post-secondary education. This particular recommendation would have serious implications for Faculties of Arts and Science. Most universities in Ontario have in operation conditional admission procedures for mature students. But from past experience with such admissions, it would be pointless and in some cases harmful to the individual involved to grant even conditional admission to universities without attempting to ascertain the capacity to benefit. Attention must also be given to the field of study: generally speaking our experience is that mature students often do well in the humanities, have difficulty in the social sciences, and generally suffer failure in the sciences. Given the relative costs of these fields and the psychological impact of academic failure upon the individual, we believe that a blanket recommendation in the form in which it appears in recommendation 7 should be replaced by one which makes some attempt to take account of the individual's capacity to benefit. Furthermore, a minimum age limit, such as 21 would seem to be desirable, since in its present form recommendation 7 would appear to give the right of admission to students who have dropped out of high school in grade 9 two years before their counterparts who stay in high school to complete grade 13.

Recommendations 15, 16 and 19 also provide examples of laudable objectives which take little account of severe practical difficulties in some areas of the province. The recommendations would appear to encourage a proliferation of associated facilities, which if they are to maintain a comparable and interchangeable quality with

university programmes could be both expensive and a severe strain on recruitment of capable faculty. It may well limit the quality of education available to students if instead of moving to well developed and viable educational centres they are expected to attend a local unit unable to provide the same quality of education. . . .

Public accountability and university autonomy

The Council of Deans of Arts and Science supports strongly the statements in the draft report (p. 31) on the need to avoid stifling bureaucratic controls and to establish administrative arrangements which will encourage diversity among the universities of Ontario by maintaining the autonomy of the individual institutions. We are extremely concerned, however, that the actual structures proposed will, in the guise of ensuring public accountability, foster the very bureaucratization and homogenization which the Report declares it wishes to avoid. Nor can we find any explanation in the Draft Report of the reasons for rejecting the present arrangements concerning the C.U.A., or the alternative of a University Grants Commission on the British model. . . .

Of particular concern to us are the composition and jurisdiction proposed in Recommendation 52 for the Co-ordinating Board for Universities. We agree that it is desirable to have representatives of the informed public on bodies with general advisory responsibilities, but it is not clear why it should be necessary for the Co-ordinating Board for the Universities (Recommendation 52) to mirror so exactly the composition of the Senior Advisory Committee. Given the composition specified in Recommendation 50 and 52 for the Senior Advisory Committee and for the Co-ordinating Board there would be a double dilution of academic experience in the policy making processes. In view of the extensive executive jurisdiction apparently contemplated for the Co-ordinating Board, we consider that its proposed membership will be woefully unrepresentative of people experienced in the academic problems of different faculties and programmes within the universities. Many university governing bodies and senates have found it difficult to make wise decisions on these matters at the appropriate times, even with a wide representation of faculty members, administrators, students and laymen. It will be difficult for a Board with so few members directly experienced in these problems to make wise executive decisions for all the universities of Ontario.

As a body, the C.D.A.S. is already clearly on record concerning the undesirability of province-wide controls over undergraduate programmes. We accept the view that in the field of graduate studies province-wide co-ordination may contribute to the avoidance of unnecessary duplication of expensive specialties within Ontario universities. But we are firmly opposed to province-wide controls over specific undergraduate programmes within the arts and sciences in Ontario universities because we are convinced that in undergraduate work in these areas any single specialty must be considered as one of a number of mutually supporting fields of learning. The people of Ontario will be best served by having available variety in the undergraduate programmes within its universities. This will be achieved best if each university autonomously designs its own blend of specific programmes. The Draft Report (Recommendation 52, Policy (c)) advocates financing universities on a formula basis, but it is difficult to see why such a basis of financing is to be continued if the autonomy of decisions on academic policy, which formula financing was intended to protect, is simply to be abandoned. . . .

Financing post-secondary education and research

The three traditional roles of Universities have been to preserve and disseminate knowledge and to increase our store of knowledge. It is primarily the combination of these three activities within a single institution that distinguishes a University from a research institute on the one hand and a purely teaching institution on the other. So much has been written on the importance of research to University teaching and of the stimulus that research and scholarly activities receive from questioning students that there is no need to expand upon this here. While we acknowledge the validity of the Commission's statement that ". . . it is irrational to make all or most of our support for research dependent upon the number of students", we are deeply concerned that there continue to be sufficient support for research and scholarship so that Ontario universities can continue in their role as knowledge producing institutions. . . .

Although the Commission on Post-Secondary Education avoids a direct statement of how much research "on the existing stock of knowledge" is justified as a charge on teaching, Appendix E suggests that little time is to be made available for this purpose, since an increase in average teaching hours in arts and science to 13 hours a week is implied. It is further suggested that two hours of preparation are required for each class hour, bringing the total work week to a modest 39 hours! This simplistic calculation, however, is based on a very arbitrary assessment of time required for preparation and neglects the fact that students place additional legitimate demands upon their professors for individual help and advice and that time and effort are required to mark examinations and other written work. In Appendix E, Table E3, of the Draft Report it is suggested that class size

might remain as it is now, but the student-faculty ratio proposed would be nearly one and a half times the present average—and one and a half times the present high school figure. A student-faculty ratio of 24 combined with an average class size of 37, would mean that the average faculty member teaching 13 hours might have 148 students enrolled in the four or so courses he teaches. Supposing that he devoted *one hour per year* to marking the work of each student in his courses and talked to the student outside class for *one hour per year*, 296 hours would be added to his teaching time for a year, or some ten hours a week over a 30 week academic session (without including the marking of examinations). At present many teachers although responsible for less than 148 student course enrolments spend far more than ten hours a week on marking and consultation with students. Equally clearly, they would not be able to devote as much time to these activities if they were assigned an average of 13 class hours per week. Moreover, it is obvious that a mere one hour of marking and one hour of consultation per student per course per year would fall far short of the quality of university education which the students of Ontario should have a right to expect. . . .

ONTARIO COUNCIL ON GRADUATE STUDIES

The mind is not a vessel to be filled, but a fire to be kindled—PLUTARCH.

Concept of a University

A University is that institution in society where students seek to gain knowledge with the assistance and guidance of those people who are actively involved in the acquisition and extension of knowledge and scholarship. The minimum criteria which this implies for that institution are:

(i) a place where students learn
(ii) a place where professors teach
(iii) a place where professors and students practice scholarship and extend knowledge

Lacking any of these three attributes, the University would cease to exist as the institution we now have.

In order that the extension and transmission of knowledge may proceed without interference from church, state, or vested interest, the concept of university autonomy has developed. This concept requires that, as a minimum, the University has the ultimate authority over:

(i) who is taught (but not necessarily how many)
(ii) what is taught
(iii) who does the teaching

At the operational level these require that the University alone has the right to select both its students and its professors.

Those recommendations in the Draft Report which have far-reaching implications for one or more of these cornerstones of the University are identified below.

Comments on the Recommendations

Recommendation 46—Manpower Requirements

The suggestion that an intergovernmental agency be established to provide manpower projections can be endorsed. The Commission as recommended might well be able to provide more manpower information than has been available in the past, but it should be recognized that manpower needs are difficult to assess accurately at the best of times. Data which are available should be taken into account; however these alone should not be relied upon by educational planners. It is especially important at a time when placement of university graduates in the Canadian labour market has been slower and less certain than in past years, to re-emphasize the importance of maintaining a reasonable flow of Canadian graduate students with higher degrees.

Recommendation 52—The Coordinating Board

It should here be emphasized that, at the graduate level, there has been operative within the Province of Ontario for a number of years, a body which has been performing the *functions* envisaged for this Coordinating Board. Through its Appraisals Committee and its Advisory Committee on Academic Planning, the Ontario Council on Graduate Studies has introduced province-wide coordination and planning of graduate programs in order to maintain high academic quality and to avoid unnecessary dupli-

cation of graduate offerings. There is no reason to suppose that coordination and planning cannot be carried out at the undergraduate level in a manner which is equally as effective.

The jurisdiction to establish new faculties and programs and to admit students to these programs now belongs to the Universities. The necessity for cooperative planning among Ontario universities is not questioned, and if the planning is to be more than a useless exercise there must exist the power to enforce a recommendation of the planning board. If, however, this planning and coordination fall within the jurisdiction of a Coordinating Board which is responsible to the government, then higher education becomes an arm of the government and the concept of university autonomy disappears.

The Draft Report claims that the public interest would be safeguarded by a Coordinating Board responsible to the government. What is the "public interest" in this regard? Is it to see that public money is economically used in university education? If so, it is not unreasonable to trust a body answerable to the universities for this purpose. If the "public interest" includes a consistently high standard of scholarship among its intellectual leaders, then that surely is better safeguarded by the academic community itself.

Recommendation 61—Separate Instructional and Research Budgets

Several institutions in society are involved with teaching. Of these, the University is unique in that its teaching is done by those people who are continuously involved in the extension of knowledge. This requires a sizeable proportion of each professor's working time being devoted to the extension of knowledge. His teaching remains effective only so long as this activity persists.

Recommendation 61 suggests that the operating costs of the University be divided into an instructional (teaching) component and a research (scholarship) component. These two activities, however, are closely inter-related so that it may be difficult, although not impossible, to separate them on a rational basis. To attempt to do so would violate the underlying philosophy of the University. It would imply that teaching could be carried on in the absence of research and scholarly activity. While there are institutions where this can indeed be done, those institutions are not Universities.

Recommendation 64—Student Financial Support

Under the scheme proposed in this recommendation, no graduate student would receive a support grant since he would have been an undergraduate for at least three years, and if he did not receive a scholarship or fellowship would have to rely totally on loans to finance his postgraduate education. The Ontario Council on Graduate Studies has a clearly defined policy on financial support for graduate students (see "Report to the Ontario Council on Graduate Studies of the Committee on Student Financial Support", August 1970).

Recommendation 69—Scholarships

This recommendation agrees in spirit with current Ontario Council on Graduate Studies' thinking. There are points of caution to observe, however:

(i) there is no mention of the approximate number of these special scholarships to be awarded. Unless there are at least 1500 contemplated, the level of scholarship support will be lower than that under the current Ontario Graduate Fellowship program.

(ii) the reiteration following Recommendation 69, that the Commission feels no special treatment should be given to graduate studies, heightens apprehension about the size of the proposed premium scholarship program anticipated.

(iii) it is not reassuring to note that the only reason given in support of this scholarship program is to offset the possibility of too much "brain-drain".

RESPONSES

To the Draft Report of the Commission on Post Secondary Education in Ontario